

## Administering CoC and ESG Rapid Re-housing Assistance

Originally adopted from policies created by Salt Lake County related to the administration of the Emergency Solutions Grant.

- Rapid re-housing assistance aims to help individuals or families who are homeless move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services.

### POLICY AND PROCEDURES

1. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG and CoC RRH.
2. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
3. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
4. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.
5. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
6. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

**Evaluating Client Eligibility:** Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG and CoC RRH.

#### A. ELIGIBILITY

1. **Income Eligibility:** Individual or household Adjusted Gross Income must be at or below 50% of the Area Median Income (AMI). (ESG Rapid Re-housing participants must fall below or equal to 30% AMI.) AMI limits are available on HUD's web site at: <http://www.huduser.org/DATASETS/il.html>.
2. **Housing Status:** The household must be either at risk of homelessness (for prevention assistance) or homeless (for rapid re-housing assistance) as defined by HUD. Housing status documentation must be kept in client file.
3. Eligible participants must be willing to enroll in the program, and commit to make efforts to take over full contract rent when the subsidy concludes.

#### B. REQUIREMENTS FOR ALL PROGRAM PARTICIPANTS WHETHER HOMELESS OR AT RISK OF HOMELESSNESS

##### B. ELIGIBILITY DETERMINATION

1. Evaluations: Agencies providing assistance must provide an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG and CoC assistance including the amount and types of assistance the individual or family need<sup>ed</sup> to regain stability in permanent housing.

These evaluations must be conducted in accordance with the Continuum of Care centralized or coordinated assessment requirements and the agency Policy and Procedures. Evaluation documentation must be kept in client file.

Agencies should have a process in place to refer persons ineligible for ESG and CoC assistance to the appropriate resources or service provider that can assist them.

2. ~~Income Eligibility: Individual or household must be at or below 50% of the Area Median Income (AMI). (ESG Rapid Re-housing participants must fall below or equal to 30% AMI.) AMI limits are available on HUD's web site at: <http://www.huduser.org/DATASETS/il.html>.~~
3. ~~Housing Status: The household must be either at risk of homelessness (for prevention assistance) or homeless (for rapid re-housing assistance). Housing status documentation must be kept in client file.~~

**2. HOUSING STATUS DETERMINATION Housing Status:**

Each household served with financial assistance and/or housing and stabilization services must be determined to be either at risk of losing housing (ESG Prevention) or homeless (Rapid Re-housing) through a housing status determination process that includes documentation of the household's current living situation.

At Risk of Homeless – Definition

4. ~~Category 1 – Individuals and Families:~~

a. ~~An individual or family who:~~

i. ~~Has an annual income below 30% of area median family income for the area; AND~~

ii. ~~Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND meets one of the following conditions~~

1. ~~Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; OR~~
2. ~~Is living in the home of another because of economic hardship; OR~~
3. ~~Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR~~
4. ~~Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR~~
5. ~~Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR~~
6. ~~Is exiting a publicly funded institution or system of care; OR~~
7. ~~Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Consolidated Plan.~~

2. ~~Category 2 – Unaccompanied Children and Youth:~~

a. ~~A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.~~

3. ~~Category 3 – Families with Children and Youth:~~

a. ~~An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.~~

Homeless – Definition

1. Category 1 – Literal Homeless:

- a. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - i. has a primary nighttime residence that is a public or private place not meant for human habitation;
  - ii. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local

- government programs); OR
- iii. Is exiting an institution where (s)he has resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
2. Category 2 – Imminent Risk of Homelessness:
    - a. Individual or family who will imminently lose their primary nighttime residence, provided that:
      - i. Residence will be lost within 14 days of the date of application for homeless assistance;
      - ii. No subsequent residence has been identified; and
      - iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing
  3. Category 3 – Homeless under other Federal statutes:
    - a. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
      - i. Are defined as homeless under the other listed federal statutes;
      - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
      - iii. Have experienced persistent instability as measured by two moves or more during the preceding 60 days. Can be expected to continue in such status for an extended period of time due to special needs or barriers
  4. Category 4 – Fleeing/Attempting to Flee Domestic Violence:
    - a. Any individual or family who:
      - i. Is fleeing, or is attempting to flee, domestic violence
      - ii. Has no other residence; and
      - iii. Lacks the resources or support networks to obtain other permanent housing

5. ~~CoC Program Rapid Rehousing~~

- a. ~~Continuum of Care funds for Rapid Rehousing must serve households with children living on the streets or in emergency shelter.~~

Note: ESG dollars can serve Categories 1 and 4. CoC dollars can serve Categories 1, 2, and 4. For CoC-RRH assistance to be provided to persons defined as homeless under Category 3, the project must be located within the geographic area of a CoC that has received HUD approval to serve this population. ESG assistance may not be provided to persons defined as homeless under Category 3.

C. INCOME DETERMINATION

Each household's Adjusted Gross Income served with financial assistance and/or housing and stabilization services must be determined to be below 50% of Area Median Income (AMI) through an income determination process that includes identifying the applicable AMI, documenting income, and calculating household income. (ESG Rapid Re-housing participants must fall below or equal to 30% AMI.)

D. RE-EVALUATION: Program participant's eligibility and the types and amounts of assistance the program participant needs must be re-evaluated not less than once every 3 months for prevention assistance, and not less than once annually for rapid re-housing assistance. At a minimum each re-evaluation of eligibility must establish that:

1. The program participant needs to show progress in establishing income beyond initial AMI eligibility. If this criterion is not met, the case manager must document the extenuating circumstances and obtain a waiver from their supervisor AND
2. The program participant lacks sufficient resources and support networks necessary to retain housing without ESG or CoC assistance.

3. Each program participant must notify the agency regarding changes in their income or other circumstances (e.g., changes in household composition) that affect the participant's need for ESG or CoC assistance. When notified, agency must re-evaluate the participant's eligibility and amount and types of assistance needed.

**Coordination Policies and Procedures:** Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

- A. ~~Consultation with ESG Funders:~~ Salt Lake and Tooele County Continuum of Care will consult with the Salt Lake County and City to receive input on allocating ESG and CoC funds; developing performance standards evaluating project outcomes; and implementing procedures for the administration and operation of HMIS.
- B. ~~Coordination with other Targeted Homeless Services:~~ Salt Lake and Tooele County Continuum of Care will coordinate and integrate ESG funded activities to the maximum extent practicable with other programs targeted to the homeless people in the Salt Lake area.
- C. ~~Coordination with Mainstream Resources:~~ Salt Lake and Tooele County Continuum of Care will coordinate and integrate ESG funded activities, to the maximum extent practicable, with mainstream housing, health, social services, employment, education, and youth programs.
- D. ~~Centralized or Coordinated Assessment:~~ Salt Lake and Tooele County Continuum of Care ESG and CoC funded programs will participate in the coordinated assessment system.

**Prioritizing Services among Eligible Clients:** Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

- A. After consulting with CoC and ESG service providers receiving ESG and CoC client assistance funds, Salt Lake and Tooele County Continuum of Care will identify any client categories that need to receive preference in utilizing limited ESG and CoC assistance. Such preferences are to be used as guidance and not to eliminate any eligible person or households deemed most appropriate by the service provider who has immediate and detailed knowledge of their specific clients' circumstances.
- B. Salt Lake and Tooele County Continuum of Care preference is to assist both individuals and families with homelessness prevention and rapid re-housing assistance.
  - a. **RAPID REHOUSING:** First time homeless individuals and families who can effectively utilize ESG or CoC assistance to prevent a reoccurrence of homelessness. This is to be determined after an assessment by the case manager in consultation with the supervisor.
  - b. **HOMELESS PREVENTION:** Households who are at imminent risk of losing current housing and in need of immediate assistance to avoid moving into an emergency shelter.
  - c. ~~To identify families who are most at risk of homelessness Salt Lake and Tooele County Continuum of Care will consult with CoC and ESG service providers to determine the combination of characteristics that best describe individuals and families living in shelters or on the street. These combinations of characteristics will serve as a guide for targeting and prioritizing prevention assistance to individuals and families most in need.~~

The household lacks the financial resources to remain in its existing housing and has an eviction notice from the landlord

- i. No appropriate subsequent housing options have been identified.
- ii. The household lacks support networks necessary to remain in existing housing.
- iii. Existence of two or more risk factors including but not limited to the following: doubled- up, single-parent, loss of income in the last 90 days, disability, or large family size.
- iv. Potential impact. Would short term assistance make a difference for the client, resulting in a more stable situation in the near term?

**Policies & Procedures Regarding Client Cost Sharing:** Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.

- A. Individuals and families receiving ESG homelessness prevention and ESG and CoC rapid re-housing assistance ~~will~~ **may** be required to pay 30% of their household income toward rent. Participating individuals and families will be required to provide verification of all household income.
- B. **Subgrantees have the flexibility to determine the amount of rental assistance provided. Assistance should be "needs-based" providing the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near future.**

**Standards on Length & Amount of Rental Assistance:** Standards for determining how long a program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

- A. ~~Short-term and medium-term rental assistance:~~ An eligible individual or family may receive up to 24 months of rental assistance during any 3-year period. Short-term rental assistance is for up to 3 months of rent. Medium-term rental assistance is for more than 3 months, but not more than 24 months of rent.
  - a. Flexibility: Subgrantees have the flexibility to determine the amount of rental assistance provided.
  - b. Needs based: Assistance should be "needs-based" providing the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near future.
  - c. Security and utility ~~deposits~~ **expenses**: Subgrantees have the discretion to determine how to handle security and utility deposits **eligible expenses, according to HUD**. If the Subgrantee recovers a deposit, it must be treated/reported as program income.
- B. Rental arrears: **ESG** assistance may include payment of rental arrears consisting of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
- C. ~~Re-evaluation: Program participant's eligibility and the types and amounts of assistance the program participant needs must be re-evaluated not less than once every 3 months for prevention assistance, and not less than once annually for rapid re-housing assistance. At a minimum each re-evaluation of eligibility must establish that:~~
  - a. ~~The program participant needs to show progress in establishing income beyond initial AMI eligibility. If this criterion is not met, the case manager must document the extenuating circumstances and obtain a waiver from their supervisor AND~~
  - b. ~~The program participant lacks sufficient resources and support networks necessary to retain housing without ESG or CoC assistance.~~
  - c. ~~Each program participant must notify the agency regarding changes in their income or other circumstances (e.g., changes in household composition) that affect the participant's need for ESG or CoC assistance. When notified, agency must re-evaluate the participant's eligibility and amount and types of assistance needed.~~
- D. Termination of Housing Assistance: The subgrantee may terminate assistance to a program participant who violates program requirements. In terminating assistance to a program participant, the subgrantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law. This process, at a minimum, must consist of:
  - a. Written notice to the program participant containing a clear statement of the reasons for termination;
  - b. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
  - c. Prompt written notice of the final decision to the program participant.

**Standards for Housing Stabilization/Relocation:** Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the

limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

- A. The type of supportive services offered will be determined during an initial assessment of the family and tailored to individual barriers and needs. Eligible families will receive supportive services for the duration of the rental assistance. Such services can also be extended beyond the rental assistance period. ~~A family needs to be meeting the goals set by the family and case manager in order to be reassessed for additional months of service.~~
- B. Housing Stabilization and Relocation Services: ESG or CoC funds may be used for services that assist program participants with housing stability and placement. Eligible activities include:
  - a. Case management
    - i. ESG or CoC case management funds may be used for activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them obtain housing stability.
    - ii. Component services and activities may include:
    - iii. Counseling;
    - iv. Developing, securing, and coordinating services;
    - v. Monitoring and evaluating program participant progress;
    - vi. Assuring that program participants rights are protected;
    - vii. Developing an individualized housing and service plan, including a path to permanent housing stability subsequent to ESG or CoC financial assistance.
  - b. Housing search and placement
    - i. ESG or CoC housing search and placement funds may be used for services or activities to assist individuals or households in locating, obtaining, and retaining suitable rental housing. These may include:
      - 1. Tenant counseling
      - 2. Assisting individuals and households to understand leases;
      - 3. Securing utilities