DOH Rapid Rehousing Operations Guide

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- Welcome & Introductions

- Guide Background

- Guide Overview

- New & Notable Requirements

- Monitoring

- Tools & Resources

- Suggestions, Questions & Answers

Name, Agency, Role?

Reason you joined us today?

What do you love about Spring?

BREAK OUT GROUPS

DOH RRH Operations Guide

Background on the Guide

WHAT & WHY

- Released March 2022

- Establishes statewide Rapid Rehousing (RRH) policies and procedures.

- Applies to RRH funded by:
  - CT Department of Housing (DOH), including Emergency Solutions Grant (ESG)
  - CT Balance of State Continuum of Care (CT BOS CoC)
  - Opening Doors Fairfield County (ODFC)

- Describes the principle federal, state, and local CoC requirements in a single document.

- Replaces CT RRH Model Guidelines and CT CoC & ESG Policies and Procedures.

Target Audience

- Administrators at agencies with RRH projects

- Supervisors overseeing RRH projects

- Direct service staff in RRH projects

Provides some basic information on federal and state fiscal requirements - not intended to be an exhaustive resource on fiscal matters.

OVERVIEW

What's in the Guide?

Links to Legislative, & Regulatory Requirements:

- Emergency Solutions Grant (ESG)
- Continuum of Care (CoC)
  o Youth Homelessness Demonstration Project (YHDP)
  o Domestic Violence Bonus

RRH Core Components

Housing Location

Goal: Quickly locate and move to an affordable permanent housing option

Financial Assistance

Goal: Provide time-limited financial support to enable quick movement to permanent housing that can later be sustained without assistance

Case Management

Goal: Provide time-limited services to support housing location, move-in, stabilization in housing, and ongoing connections to community and mainstream services and supports, if needed.

For Each Core Component Guide Details:

Eligible Activities & Expenses

Documentation Requirements

Required Forms

New: RRH Forms on CT BOS Website

See DOH RRH Documents

Updated:

- Form #1 RRH Participant File checklist

- Form #2: RRH Program Agreement

- Form #4: Education Rights

- Form #6 documents that Participants Received all required RRH paperwork

- Form #20 – Recertification

- Form #21 – Exception

- Form #23 –Sample Termination Letter

- Form #23B – Sample Discharge Letter

- Form #24 – RRH Grievance Policy

- Form #25A RRH Rental/Utility Calculation Tool

- Form #25B YHDP RRH Rental/Utility Calculation Tool

Partner Responsibilities

- Project Participants
- Case Management & Housing Location Providers
- Landlords
- DOH
- CANs
- CoCs
- Fiduciary Agencies
- CT Coalition Against Domestic Violence

Other Guide Sections

- Accessing RRH
  - ✓ Document checklists at project entry, income determination, and unit approval

- Administering RRH
  - ✓ Document checklists at lease signing, interim income re-determination, 90-day recertification, and annual re-certification

- Terminating RRH
  - ✓ Steps and documents required at termination

- Grievance Process

- Performance Standards, Evaluation & Monitoring

- Allowable Expenses and Fiscal Requirements

- Resources & Definitions

WHERE DO I FIND...?

And more…

PLEASE READ THE GUIDE AND LET US KNOW WHAT YOU THINK

SEND FEEDBACK TO CTBOSCOC@GMAIL.COM

New & Notable Requirements

Project Entry Requirements

Eligibility Verification

- CAN is responsible for conducting initial applicant screening to determine eligibility.

- Case Management Provider verifies eligibility documentation **at project entry**.
  - ✓ *Eligibility is documented at the time of project entry, which usually follows CAN approval; Case Management Provider must ensure current homelessness is documented.*
  - ✓ *Maintain documentation for 5 years after end of last grant under which the participant was served.*

- CoC Program Homeless Verification Form or CT YHDP Homeless Verification Form,

Type of RRH	Eligible HUD Categories	Other Eligibility Requirements
YHDP RRH	Category 1 (including people living in TH); AND Category 4	No member of the household can be older than 24 at project entry; AND Gross annual income must be below 50% of AMI at the time of annual review
DV/HT RRH (DV Bonus)	Category 4	Gross annual income must be below 50% of AMI at the time of annual review
All Other RRH	Category 1 (excluding people living in TH); AND Category 4	At the time of annual review, gross annual income must be below 50% of AMI for CoC funded projects or below 30% of AMI for ESG funded projects

Resources for Eligibility Documentation

COC - GENERAL

CoC Homelessness Verification Form *(2021.1.11)*

Training:

HUD CoC Policies - CT BOS 2018 - PDF

ELIGIBLE OR NOT???

YHDP SPECIFIC

CT YHDP Homelessness Verification Form

Additional CT YHDP Homeless Verification Guidance

CT YHDP Determining Homeless Status of Youth

Training:

CT YHDP Managing CoC Grants Training Slides 2018 – PDF

NEW: Fast Track

Not required for participants who are only receiving a security deposit and/or first month's rent and who are not anticipated to receive additional RRH financial assistance:

- RRH Rent Calculation Tool

- Rental Assistance Agreement

- RRH Program Agreement

Prior to initiating any additional assistance, Case Management Provider must complete the three forms listed above.

Income documentation

- Must provide income documentation as a condition of participation.

- Provide assistance, including reasonable accommodations as necessary.

- Documentation must be obtained for all participants regardless of disability or other barriers.

- Amounts documented must match rent calculation tool

Zero Income

- Require each adult household member reporting zero income to complete Zero Income Affadavit.

- Be aware of obvious signs of fraud - contact DOH for guidance.

Review

ZOOM POLL

Unit Approval Requirements

# Housing Search & Support

Essential considerations:
- Participant preferences
- Affordability when assistance ends:
  - ✓ Consider employment history and near-term, feasible income goals
  - ✓ Housing stabilization plan to outline action steps to afford the unit prior to end of lease term.
  - ✓ Units that are not affordable within the reasonable, anticipated budget are not a good fit.

Exit planning begins on Day One!

Unit Approval - Housing Quality Standards (HQS) Inspections

- Required prior to expenditure

- Re-inspection required annually

- HUD HQS Inspection Form (documents lead visual inspection)

- New: Lead Visual Inspection Form #10 retired

- Be sure form is signed and dated and unit indicated matches lease.

- Acceptability criteria

- Inspectors must take HUD's Lead-Based Paint Visual Assessment Training and maintain certificate on file
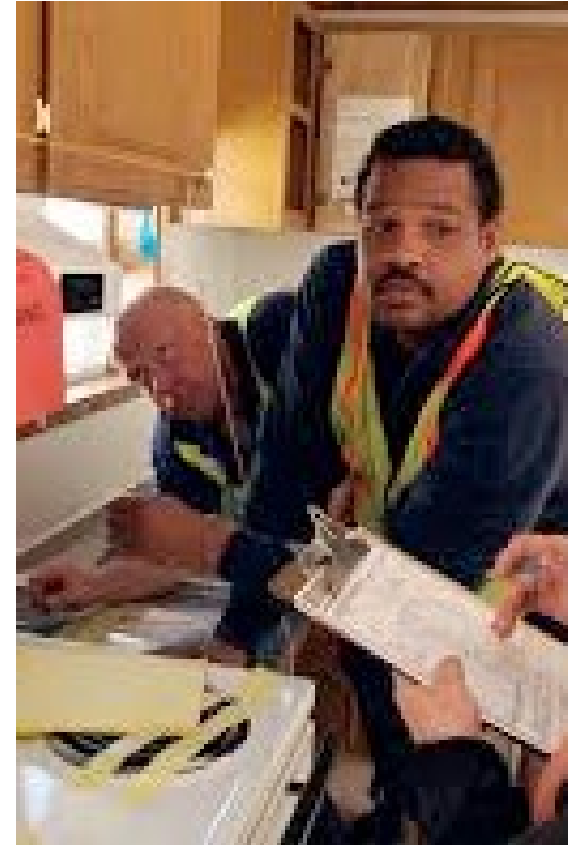
Unit Approval -Rent Reasonableness

- Document 3 comparable units – rent for assisted unit must not be higher than comparables

- Must consider location, size, type, quality, amenities, facilities, and management and maintenance

- When using comps with a different utility arrangement than the assisted unit, must document adjustments based on the utility allowance

- Required at a minimum annually
- Rent Reasonableness Checklist

Unit Approval Requirements (2)

Environmental Review

✓ DOH maintains the principal documentation

✓ For units in a coastal community (see list on Form #19), the Case Management or Housing Location Provider is responsible for checking unit addresses against the US Fish and Wildlife Service's Coastal Barrier Resource System Mapper and retaining a copy of the Coastal Barrier Resource System (CBRS) map documenting that the unit is not within a Coastal Barrier Resource Unit. Rental assistance cannot be provided to units within the Coastal Barrier Resources System.

Leases

Minimum required term 12 months

- Renewable for terms of at least one month
- Be sure utility arrangements (who pays for what are specified).

Also Required:

- VAWA lease addendum
- RRH Rental Assistance Agreement
- Lead Disclosure Form

Rent Calculation & Re-Determination

New— RRH Rent Payment Standards

Does not apply to YHDP

- **Month 1:** Security, 1st Month's Rent, & any applicable utility allowance Covered at 100%.

- **Months 2-6:** Tenants pay 30% of net income towards rent and any applicable utility allowance; RRH rental assistance covers remaining rent and utility allowance

- **Months 7 to program exit:** Tenants pay 60% of net income towards rent any applicable utility allowance; RRH rental assistance covers remaining rent and utility allowance

- If tenant has been approved for PSH or other housing voucher (EHV, Mainstream, HCV, RAP) and is pending transition, tenant's portion will be calculated at 30% of net income until transitioned to permanent subsidy.

Financial assistance ends when:

- Participant has reached 12 months of assistance (extensions possible up to 24-month maximum allowable term; extensions should be rare).

- Household net income is equal to or greater than 60% of gross rent; gross rent = rent + utility allowance (does not apply to YHDP)

New: Utility Allowance – Required by HUD

- Include any applicable utility allowance when calculating rent contributions for program participants who are responsible for paying their own utilities.

- Participant is responsible for providing the Provider with documentation of all applicable utility accounts that they are responsible for paying (e.g., a gas bill, an electric bill, a water bill, etc.).

- Use DOH utility allowance schedule from the State of CT Department of Housing.

- Utility allowances are updated and must be obtained annually.

New: Utility Allowance – Required by HUD (2)

- Enter allowance(s) for only utilities the tenant is responsible for paying into the Rent/Utility Calculation Tool

- Utility allowance applied must match utilities for which tenant is responsible as specified in lease.

- If the sum of all applicable utility allowances exceeds the participant's required contribution, the Fiduciary Agency will make a payment to the utility company.

Example – Month 2 RRH Financial Assistance

Ms. Reid's lease indicates that she is responsible for paying heat and electric. Rent for her unit is $1000 per month. Ms. Reid's monthly net income is $100.

- Rent @ 1 month = $1000

- The utility allowances per month are: electric $50 and heat $50 (total: $100 per month).

- Ms. Reid's share in month 2 is $100*.3=$30
  ◦ Ms. Reid pays $30 to the utility company. Remaining $70 of utility allowance is paid by RRH
  ◦ Ms. Reid pays $0 to the landlord

Total month 2 RRH financial assistance payment = $1070

○ $1000 in RRH funds is paid to the landlord

○ $70 in RRH funds is paid to utility companies

Any remaining amount owed to utility companies is paid by Ms. Reid.

Utility Assistance

New: Income determination & rent recalculation

- Required at least every 90 days

- Also required for monthly net income decrease of $40 or more.

- May also be helpful when a smaller decrease in net income would yield a rent reduction that would be meaningful to the participant.

- Required at each 90 Day Review:
  - ✓ 25A – RRH Rent/Utility Calculation Tool
  - ✓ 25B – CTBOS YHDP RRH Rental/Utility Calc Tool
  - ✓ Update housing stabilization plan
  - ✓ Recertification form

Notification of Rent/Utility Obligation

Housing Provider is responsible for helping participant to understand the rent/utility allowance calculation

Upon initial calculation provide: Financial assistance letter to landlord (Form 17b)

Whenever rent is calculated must provide: Payment Letter to Tenant (Form 17 or 17a for YHDP)

# Recertification – Every 90 days

- Financial assistance ends when it is no longer needed to prevent imminent homelessness.

- <u>Recertification form</u> must be signed by participant & supervisor & considers:
  - ✓ Can the household afford the rent and maintain the lease?
  - ✓ Are they connected to all community supports/resources per their housing stabilization plan?
  - ✓ Is an alternative exit plan needed? (stay with family/friends, get a roommate, etc.)

Exit planning begins on Day One and occurs at least monthly!

Annual Recertification

Conducted at month 12 of initiation of RRH financial assistance and must include:

- Determination of income eligibility - gross annual income must be below 50% of Area Median Income (AMI) for CoC funded projects and below 30% of AMI for ESG funded projects.

- Income limits are available here.
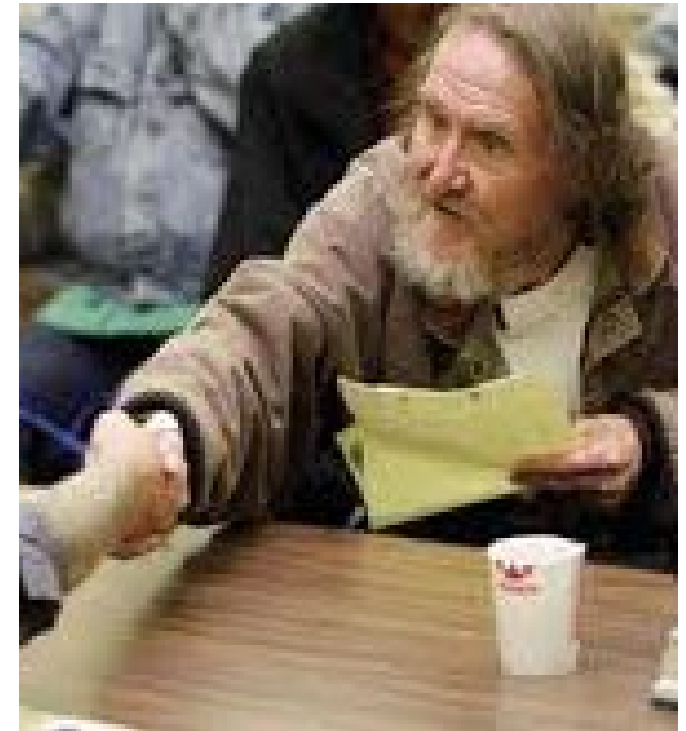
EXCEPTIONS: Requesting RRH Rental Assistance Beyond 12 Months

1. Case Management Provider presents rationale during a CAN Case Conference; CAN approves or declines.

2. If approved, Case Management Provider prepares an Exceptions Form (Form #21); CAN Coordinator/Housing Solutions Facilitator signs the form; attach or upload Recertification Form in HMIS

3. Case Management Provider submits the Exceptions Form to the applicable DOH CAN Manager. If approved, the DOH CAN Manager signs the Exceptions Form.

4. Case Management Provider submits the Exceptions Form to the applicable fiduciary agency and uploads the form to HMIS (or the comparable database).

5. The fiduciary agency processes the rental assistance.

Processing Payments
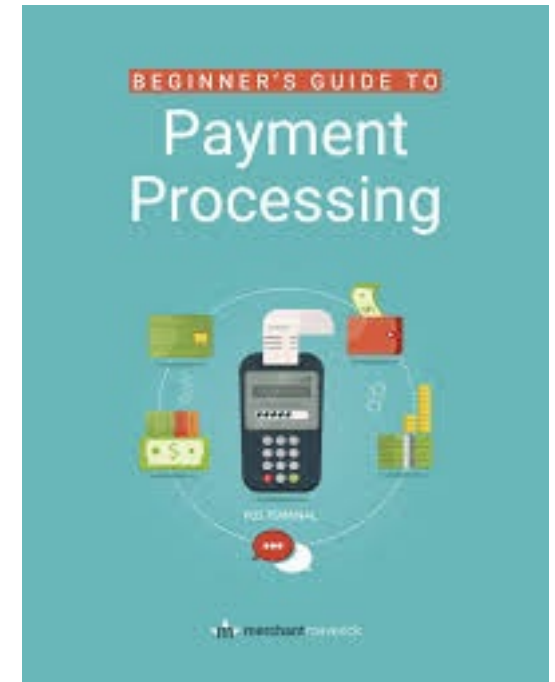
ACT RRH Webinar:

3/31, 1 to 3pm

Join Zoom Meeting

https://us02web.zoom.us/j/87561181085?pwd=cnJKNkM2NU56OHNhQkc1bXFtNzRBQT09

 ID: 875 6118 1085

Passcode: rrh31

Form #19 – RRH Fund Request

• ACT RRH Trainings

What changes will your project need to make?

What supports will your team need?

What benefits and challenges do you anticipate?

BREAK OUT GROUPS

Engagement & Housing-Focused Case Management Requirements

Case Management Models

Required Models

Harm Reduction

Housing First

Progressive Engagement

Assertive Engagement

Motivation Building

Trauma Informed Care

Strengths Based

Sometimes Required
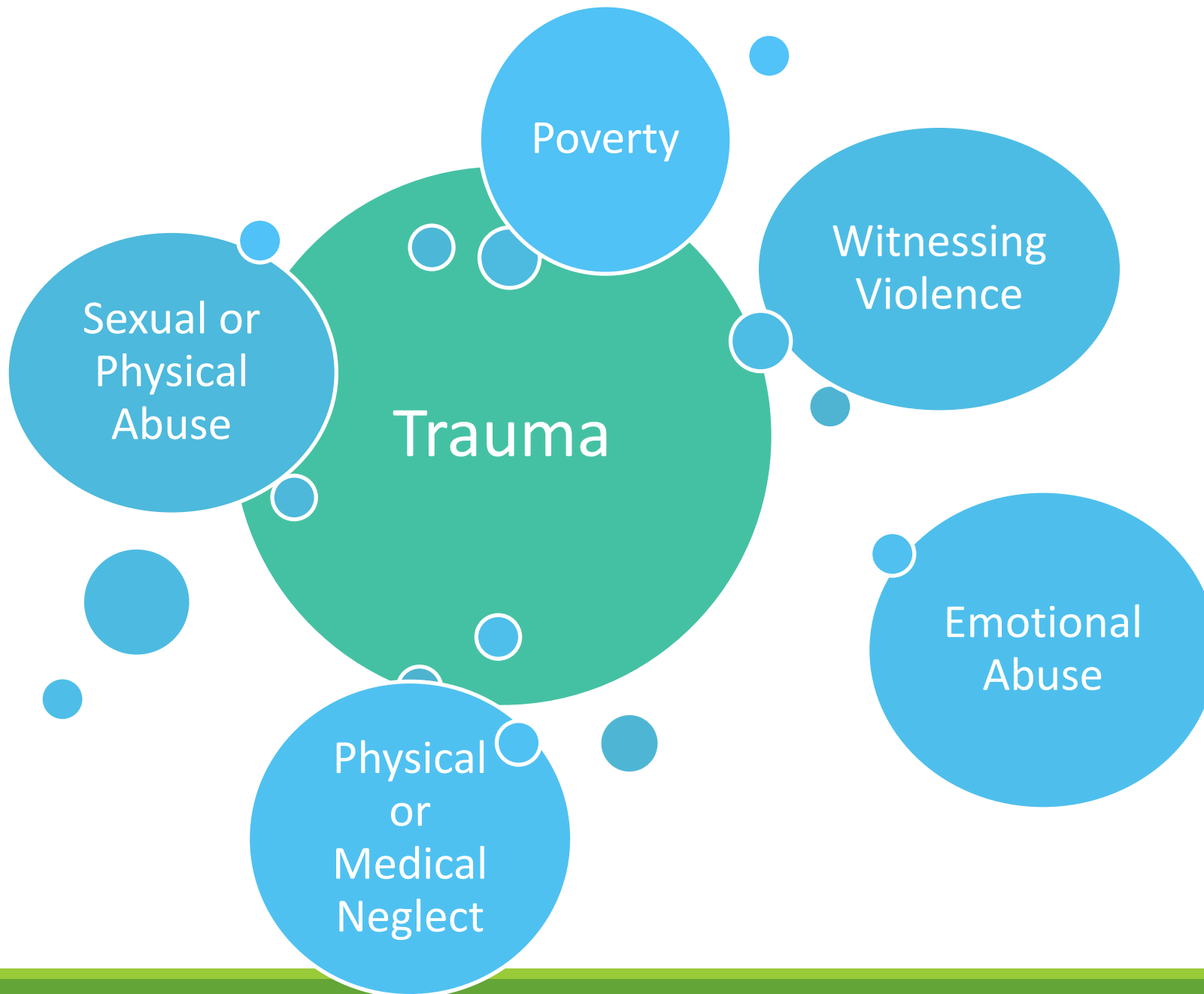
Positive Youth Development

Safety Planning

Strongly Encouraged

Critical Time Intervention

Day One: Develop a relationship
Primary Goal: Create a "why" for the person to engage with you.

Trauma & Homelessness

People experiencing homelessness are likely to have experienced & continue to experience some form of trauma, which can interfere with:

- Sense of safety

- Perception of control and self-efficacy

- Interpersonal relationships & ability to self-regulate

Trauma-Informed Care Examples:

- Emphasize safety & be predictable

- Emphasize client choice & rebuild control

- Be aware of triggers and avoid re-traumatization

- Assist to identify strengths and build skills

Housing First

Everyone is ready for housing, regardless of the complexity or severity of their needs. Services post housing support stability and prevent returns to homelessness.

Housing First - the rest will follow

Housing First Best Practices

Assertive engagement using motivational techniques

Comprehensive assessment and housing planning

Harm reduction/recovery oriented

Links to Community Supports: social, spiritual, libraries, sports, arts, recreation

Individualized and person-centered

Client-Centered, Assertive Engagement

- Offer services multiple times and in different ways.

- Understand client perspectives, including any reasons they are not using services.

- Help clients solve the problems that are most important to them.

- Make and consistently deliver on commitments.

- Advocate with community partners to make sure clients get the services they need and that services are working for them.

Minimum Monthly Contact

- Case managers must meet with participants at least once per month.
- It is staff's responsibility to engage all participants:
  - Use multiple contact methods
  - Be persistent in efforts to build rapport
  - Find something you can help with
  - Build trust, hope and confidence
  - Help participants to feel safe, respected, and in control
  - Adjust services to make them more attractive

Housing Stabilization Planning Process

Requirements:
- Monthly progress reviews
- Update at least every 90 days

Housing Stabilization Plan
CTI Informed Plan

Engagement

Assessment

Goal Development

Motivation Building

Updating the Plan
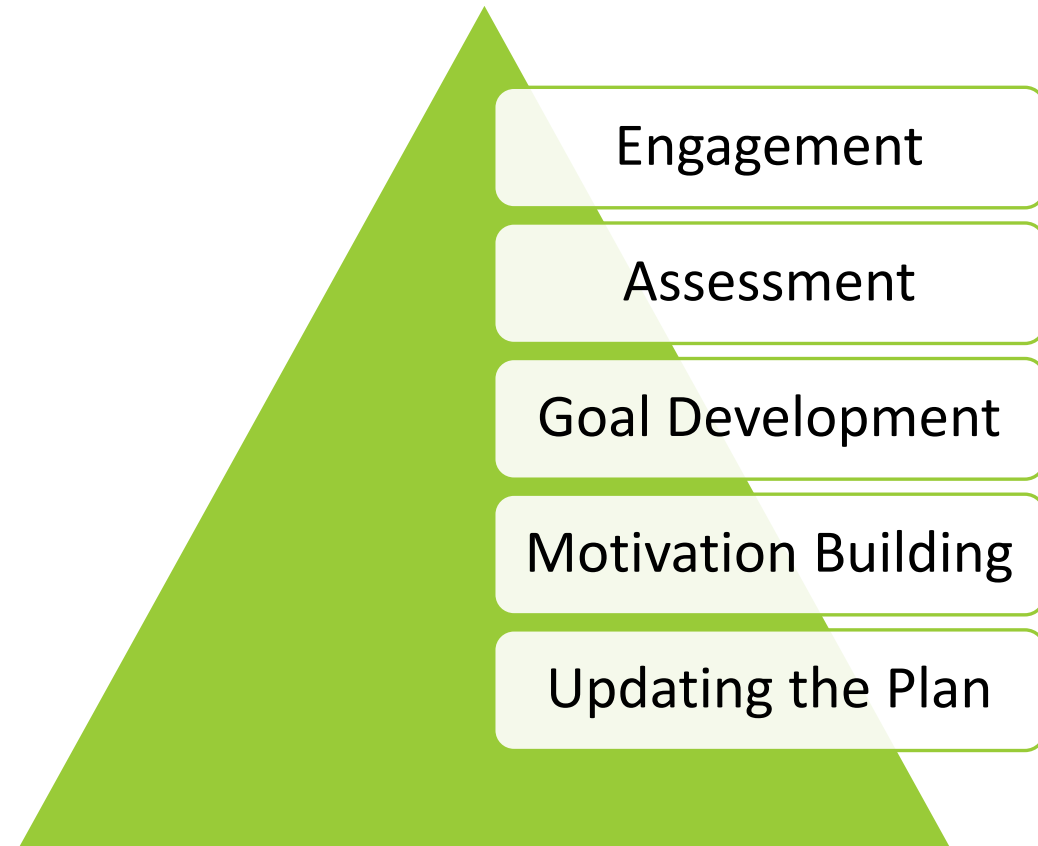
Housing Stabilization Plans

- Guides and provides structure for the work.

- Goals focused on what matters to the client.
  - ✓ "So that" principle. I want x so that y happens.

- Outlines plan to housing affordability & RRH exit.
  - ✓ Makes progress manageable by breaking out small steps.
  - ✓ Exit planning begins on day one & occurs at least monthly

- Requires on-going assessment - Informed by discussions with client, team, informal supports & community resources.

- Evolves over time.

- Builds hope and a sense of accomplishment as objectives are achieved.

Housing Stabilization Services

- Landlords are responsible for lease enforcement.

- Case Managers are responsible for helping participants to understand and comply with lease, including:
  - Educate participants regarding lease terms
  - Assist to avoid/correct violations and reduce eviction risk
  - Coordinate with owner to encourage proactive lease enforcement and negotiate plans to address violations

Harm Reduction

Accept clients' priorities and choices as a matter of fact without judgment.

Help client to identify personal goals and preferred paths to achieve.

Raise awareness of options, risks and strategies to reduce harm.

Intervene, as necessary, when someone presents an imminent risk of danger to self or others.

Building Motivation for Change: Hope, Meaning and Confidence

HOPE
- How can you change if you don't think it is <u>possible</u>?

MEANING
- How can you change if you don't think it is <u>important</u>?

CONFIDENCE
- How can you change if you don't think <u>you can do it</u>?

Which of these approaches is your RRH project already using successfully?

Which could use more attention?

ZOOM POLL

Case Note Requirements

Document each engagement/attempt with participant or collateral contacts, including:

- office or community-based face-to-face contacts;

- phone calls, texts, and video chats;

- Maintain in the chart copies of correspondence/emails;

- Document referrals/linkages (date, reason, outcome)

Write immediately after
- Lesser backlog
- Better recollection of what happened.

Write later in batches
- More time to process.
- More time to batch clear.

Case Note Requirements (2)

At a minimum, case notes must include:

- Date, location, and purpose of the activity;

- Monthly progress on housing goals;

- Documentation of monthly contact with the participant;

- Indication of all required re-determinations

- Discharge summary (date of program exit, reason for exit, brief assessment of participant's ability to sustain housing, and evidence that the participant was connected to appropriate ongoing services in advance of discharge)

Project Exit Requirements

Warm Hand-offs

- Leverage RRH workers' rapport.

- Accompany clients to appointments with new service providers whenever possible.

- Provide follow-up support on a gradually declining basis to both new staff and the client.

Preventing Unsuccessful Exits

- Leverage all available resources – CAN, mainstream resources, etc..

- Assist with landlord negotiations.

- Use assertive engagement strategies

- Notify CAN at earliest possible point – CAN will convene a case conference.

- Make every effort to help participants to remain stably housed.

Reasons to Discontinue RRH Financial Assistance

- Participant indicates they are no longer in need of/interested in RRH assistance;

- Participant has reached 12 months of assistance (extensions possible up to 24-month maximum allowable term; extensions should be rare).

- Participant income exceeds cap:
  - At the time of annual review, gross annual income must be below 50% of AMI for CoC funded projects and below 30% of AMI for ESG funded projects;
  - Household net income is equal to or greater than 60% of gross rent; gross rent = rent + utility allowance (does not apply to YHDP)
  - For YHDP: Project supervisor determines if household income is sufficient to pay full rent for purposes of determining when to discontinue rental assistance.

Reasons to Discontinue RRH Financial Assistance (2)

- No communication for at least 30 days after multiple, documented provider attempts to contact (see No Contact Procedures in Guide);

- Not providing required income documentation;

- Repeatedly declines to provide access to to conduct a HQS inspection;

- Unit is vacant for 90 days or more due to incarceration, hospitalization, residential treatment or for any other reason; or

- Participant has engaged in or made serious, credible threats of violer behavior

- See Form 23A

Termination of Assistance

Written notice of termination:

- Reasons for terminating - provide a written copy of rules (Form 23A)

- Notify participant of opportunity to appeal decision (Form 24)

- Right to receive written notification of final decision

- Send the notification to the last known address, if current address is unknown.

Sample Termination Letter

Sample Discharge Letter – keeps it positive!

Other Termination Requirements

◦ Advise of VAWA rights - Include VAWA Notification of Occupancy Rights and Incident Self-Certification form with termination notice

◦ Requirements apply regardless of whether termination is voluntary or involuntary (only exception is when participant is deceased)

◦ Stop Payment Letter to landlord, copied to participant and fiduciary - Always required.

◦ Document exit inspection (if participant is vacating the unit)

Grievances

- Case Management Provider must:
  - Have a Grievance Policy and Procedure for their agency
  - Document that participants received their agency's Grievance Policy at project entry & exit
  - Designate a liaison to assist participants to navigate the grievance process

Sample RRH Grievance Policy and Sample Client Concern Form

Grievances - Steps

1. Participant files a Concern Form with the liaison

2. Grievance is reviewed by relevant staff

3. Grievance is directed to the relevant agency and processed in accordance with that agency's grievance policy

4. If the participant remains dissatisfied, the liaison refers to the relevant CoC for review in accordance with the CoC's grievance policy

Monitoring

COC MONITORING WEBINAR SLIDES 2022 – PDF

VIDEO RECORDING:

HTTPS://YOUTU.BE/IUPNPFICGVQ

CoC Monitoring Guide - No Surprises!

- Compiles requirements into one document

- Includes criteria used during monitoring

- Cites regulations, notices, and policies

- Includes links to resources

New Requirements and Monitoring

- CT BOS will begin monitoring on new requirements in 2023.

- DOH recognizes that projects need time to implement new requirements.

- To help identify necessary changes, reports will note where practice is not consistent with new requirements.

- Reports will also note that the requirement is new.

What items from today's training will you follow up on?

PUT IN CHAT OR UNMUTE TO SHARE

Additional Resources

Federal Requirements

- CoC Program Interim Rule

- ESG Program Interim Rule

- Uniform Administrative Requirements, Cost Principles, & Audit Requirements for Federal Awards

- HUD CoC Program Notices

- HUD CoC Program NOFA

- HUD CoC FAQs

- YHDP HUD Resources for Youth Service Providers

Local Requirements

- RRH Operations Guide
  - RRH Forms
- CT BOS Policies
- CT CAN Policies
- CT BOS YHDP Requirements
- ODFC Requirements

Resources for Fiscal Staff

Fiscal Components' Overview for CoC Grants-PPT

Indirect Cost Training
◦ Recording: https://youtu.be/YwjZYf7vMyc

Other Resources

- CT BOS Monitoring Links to Helpful resources

Be sure staff:

- Sign up to receive CT BOS emails -be sure to select "HUD Grantees" and "YHDP" if applicable

Final Questions & Suggestions?

Contact Info

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