



CoC Housing Requirements

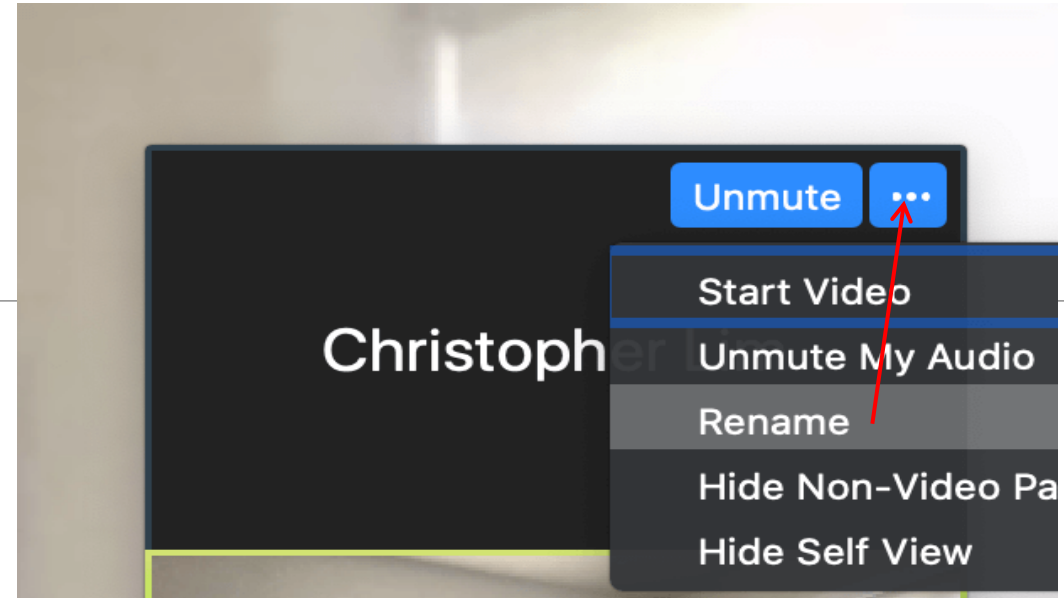
Session #2

April 1, 2025

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HOUSING INNOVATIONS

Welcome

- Introduce Facilitators
- Goals for the Session
- Housekeeping
 - PLEASE TURN YOUR CAMERAS ON AS MUCH AS YOU CAN.
 - Please put your name as you would like to be addressed as your screen name.
 - We will upload the slides to the chat box momentarily.
 - We love interaction – please raise hand, use emojis, type comments in the chat box or just unmute and talk!
 - The session is being recorded and will be posted to the web.
 - Slides are available in the chat.
 - Today's session is 2 hours





We Love Interaction

If you don't have a microphone or are having trouble with audio in Zoom, join via phone:

Meeting ID: 851 7878 0207

Passcode: 855813

Phone: 646-876-9923



Introductions

Introduce yourself in the chat box:

- Agency
- Title
- How long have you been involved in CoC programs?

Agenda

Session #1

- *Project Entry Requirements*
- *Unit Search & Approval Requirements*
- *Leasing Requirements*
- *VAWA Requirements*

Session #2 - TODAY

- Income Determination & Rent Calculation
- Re-Determination
- Project Exit Requirements
- DMHAS Specific Requirements



Income Verification & Subsidy Calculation

HIGHLIGHTS: FOR A COMPLETE LIST SEE OPERATIONS GUIDES



Income Review and Documentation - Overview

Must examine income **at admission** and **annually** at a minimum (PSH/TH); every 90 days RRH

Must include all **household members**

Must **adjust subsidy** when changes are reported by participant

Participants must **provide income information** as a condition of participation

Income determination and rent calculation

- Required at least annually - use approved worksheet.
- PSH participants must report income changes of more than \$40/month when change is expected to be ongoing within 10 days of the change.
- Rent recalculation required for income decreases (all projects) and increases (PSH)
- Must notify PSH participants 30 days in advance of any rent increase. Increase takes effect on first day of the month following the 30-day notice.



Rent Calculation Tools



[COC Rental Assistance Workbook TRA - DMHAS](#)

[COC Rental Assistance Workbook PRA-SRA - DMHAS](#)

[Workbook Reference Guide - DMHAS](#)

[PSH Rent Calculation Tool](#) – non-DMHAS projects

[RRH Rent Calculation Tool](#)

[YHDP Rent Calculation Tool](#)

What is considered income?

All income to all family members

- Employment (wages, salary, overtime, tips, commissions, bonuses) for people over 18
- Social security, pensions, disability
- Unemployment, workers compensation, severance
- Welfare assistance
- Alimony and child support
- Regular gifts
- Net income from business/profession



Verification of Zero Income

- At each initial certification and re-certification require each adult household member reporting zero income to complete a certification.
- Permanent Supportive Housing: No Income Certification
- Rapid Rehousing: Zero Income Affidavit

Income documentation

- Must provide income documentation as a condition of participation.
- Provide assistance, as necessary, including reasonable accommodations (see recording: [Policies and Administrative Requirements webinar; slides](#)).
- Documentation must be obtained for all participants regardless of disability or other barriers.
- Amounts documented must match rent calculation tool
- Retain documentation of income and supporting documentation for deductions in participant files.





Excluded from income:

- Employment income for children under 18* (Benefit income is counted)
- Temporary, non-recurring or sporadic income/gifts
- Payments for care of foster children
- Lump sum additions to assets (inheritance, insurance, lottery)
- Medical expense reimbursement
- Income of live-in aide
- Student financial aid

* Note: The earned income of a full-time student 18 years old or older who is a dependent is excluded to the extent that it exceeds \$480.

Income Calculations – Deductions

Only Allowable Income Deductions

- Elderly/Disabled Household: **\$400/year/household**
- Dependents: **\$480 per dependent/year**
- For elderly/disabled households: Non-reimbursed **Medical expenses and disability assistance** in excess of 3% of gross income
- **Reasonable costs of childcare** to promote work or education

These deductions are not applied in RRH.

Assets

Up to \$5,000

- Does not impact tenant rent

Greater than \$5,000

- Income from assets based on passbook savings rate .45%
 - $(0.0045 * \text{Amount of asset})$
- Ex.: Savings account of \$50,000 would generate **income** of \$225/year

Do I use gross or net income?



- Gross income = total income prior to any deductions
- Net income = take home pay after all deductions
- Always use net income for business income
- Use gross employment income in these project types:
 - PSH
 - TH
 - To calculate the 65% cap on the tenant contribution in YHDP RRH
- Use net income for RRH that is not YHDP



Zoom Poll

Providing documentation of income is optional for participants in a Housing First project.

Joe is 22 years old and babysits for his niece one day/week and gets paid cash. This income is countable when calculating rent.

Ron and Jeremy are both disabled and consider each other family. They live in PSH & each receive the disability deduction (\$800/year total) when calculating their household rent.



Zoom Poll - ANSWERS

Providing documentation of income is optional for participants in a Housing First project. FALSE

Joe is 22 years old and babysits for his niece one day/week and gets paid cash. This income is countable when calculating rent.

TRUE

Ron and Jeremy are both disabled and consider each other family. They live in PSH & each receive the disability deduction (\$800/year total) when calculating their household rent. FALSE

Utility Allowances & Reimbursements

When a participant is responsible for paying utilities:


Costs must be incorporated into the occupancy charges or rent charged to participant.

- If they exceed the participant's required rent payment, the participant must be reimbursed for the excess costs – direct payment to the utility company preferred with [participant permission](#)
- Calculate participant's rent contribution:
 1. Determine reasonable utility costs based on PHA's utility allowance
 2. If participant is responsible for utilities, subtract utility allowance from tenant rent contribution, if the end result is a negative number, that is the amount to reimburse the participant

RRH Utility Allowances and Reimbursements Webinar:

[Slides](#); [Recording](#)

Rapid Rehousing – Tenant Rent



RRH must follow CoC's written standards. CoCs have broad discretion as to what RRH participants will be required to pay.



CT BOS RRH Rent Payment Standards

See [RRH Operations Guide](#) for YHDP Rent Payment Standards

- **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)

RRH YHDP Rent Calculations New – Effective Jan 2025

- YHDP RRH projects may select which of the approved rent calculation methodologies they will consistently use (i.e., the standard methodology or the YHDP specific methodology).
- Selection and the start date of any change in methodologies must be documented in the project's written policies and procedures.
- Must use the selected methodology consistently for all participants.



PSH— Participant Rent



Program Participant Contributions Are Required

- Rent must be charged and may not exceed the highest of:
 - 30 percent of the family's monthly adjusted income;
 - 10 percent of the family's monthly income; or
 - The portion of the family's welfare assistance, if any, that is designated for housing costs.
- No minimum rents permitted

Notification of Rent Obligation

Housing Provider is responsible for helping participants to understand the calculation

- DMHAS PSH: See Workbooks (linked on slide #10)
- Non-DMHAS PSH
- RRH: 17 – Payment Letter; 17A – Sample Financial Assistance Letter to YHDP RRH Participant





Initial Payment & Security Deposit

- Pay least amount necessary to secure unit.
- Security Deposit: Up to 2 months' rent or 1 month for participants 62 or older
- Can also pay first and for PSH last month's rent at or following lease execution.
- DMHAS typically pays 1-month security and first month's rent only.

Annual Recertification Notification - PSH



PSH Housing Provider sends to participant 90 days before recertification date. Include:

- Forms to be completed and returned
- Addressed, postage paid envelope
- Time and date of HQS inspection
- Contact information to confirm or reschedule the HQS
- Copy case manager and property manager, if applicable.
- Maintain copy in chart

Recertification



PSH/Transitional Housing

- Required at least **Annually**
- Also required for gross monthly income **increase or decrease** of \$40 or more.
- May also be helpful when a smaller decrease would yield a rent reduction that would be meaningful to the participant.

RRH

- 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 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*
 - ✓ 20 – Recertification Form

Required for RRH rental assistance beyond 12 months:
21 – RRH Exception Form – REVISED – DOC.

Annual Recertification Requirements



- Housing Quality Standards Inspection
- Rent Reasonableness Determination
- Environmental Review for new units (add new unit to list, obtain maps if in a coastal county)
- Income Determination/Documentation & Rent Calculation
- Lease and HAP Contract Execution (PSH)
- HMIS Annual Assessment (impacts APR & Renewal Evaluation)
- Payment Processing & Other Required Forms (see Operations Guides)

Zoom Poll



What determines the utility allowance amount I should enter into the rent calculation tool?

- A) The current month's amount shown on a participant's utility bill*
- B) The amount shown on the DOH or PHA utility allowance schedule*
- C) The amount of arrears shown on the participant's utility bill*

How often must HQS and Rent Reasonableness Determinations be completed?

Zoom Poll - ANSWERS



What determines the utility allowance amount I should enter into the rent calculation tool?

- A) The current month's amount shown on a participant's utility bill*
- B) The amount shown on the DOH or PHA utility allowance schedule CORRECT*
- C) The amount of arrears shown on the participant's utility bill*

How often must HQS and Rent Reasonableness Determinations be completed? AT LEAST ANNUALLY

Housing Stabilization Services

- Owners are responsible for lease enforcement.
- Service/Housing Providers 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
 - Meet with participants in their apartments (PSH: required at least once in first 30 days of tenancy and every 6 months thereafter)
 - PSH: Health and Safety Checklist at least annually approximately 6 months following HQS (Service Provider requirement)



Preventing Unsuccessful Exits

- Leverage all available resources –includes service provider, CAN, mainstream resources, etc..
- Notify CAN at earliest possible point – CAN will convene a case conference.
- Make every effort to help participants to retain assistance and remain stably housed.
- When violations are serious enough and all avenues to correct have been exhausted and termination of assistance may be allowable and warranted.
- Participants have the right to appeal - following procedures & documenting issues and interventions will reduce likelihood of reversal on appeal.





Eviction

- Owner may evict only through court action.
- Regular communication with owners is key to assess and respond to eviction risks.
- Negotiations to avoid formal eviction are strongly encouraged.

Retention of Assistance and Re-housing



- Eviction/unit loss does not result automatically in termination from the CoC project.
- Maintain enrollment and re-house whenever possible – project exit can impact eligibility for CoC assistance.
- If not possible, participant can re-enroll at a later date - eligibility and prioritization criteria apply.



Warning Letter - PSH

Prior to commencing termination notify participant in writing:

- Specific reason
- Instructions to contact Provider immediately to discuss steps to remedy
- Send by mail
- Copy case manager
- Maintain in chart

Re-set Discussions - RRH

Prior to discontinuation of financial assistance:

- Engage participant in a re-set discussion to review the structure of the RRH program, expectations around monthly case management, housing stability plan and next steps
- Send a letter to the participant documenting the discussion and next steps





Project Exit Requirements

HIGHLIGHTS: FOR A COMPLETE LIST SEE
OPERATIONS GUIDES



Termination of Assistance Requirements

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

Written notice of termination:

- Reasons for terminating - provide a written copy of rules
- Notify participant of opportunity to appeal decision
- Right to receive written notification of final decision
- Advise of VAWA rights - Include [VAWA Notification of Occupancy Rights](#) and [Incident Self-Certification](#) form with termination notice
- Send the notification to the last known address, if current address is unknown.

Termination of Assistance – Addition Requirements - PSH

All PSH

[Warning Letter Sample](#)

DMHAS PSH

[Termination from HEARTH Housing Form 9 24 12](#)

[Termination Letter with Formal OOC Hearing Request](#)

[Termination Letter with Informal Hearing Request](#)

Stop Payment via a [Change order](#)



Termination of Assistance - RRH

RRH

- Form 23A – Allowable Reasons to Terminate
- Form 23 – Sample Termination Letter
- Form 23B – Sample Successful Discharge Letter
- Stop Payment Letter to landlord, copied to participant and fiduciary - Always required.
- Document exit inspection (if participant is vacating the unit)



Security Deposit Refunds



- Document condition of the unit at move-in (e.g., photos in the chart)
- Document exit inspection to assess any damage caused by the Participant
- Property Owner may, subject to applicable State and local laws, use the security deposit as reimbursement for unpaid tenant rent or damages in accordance with lease
- Property Owner must promptly refund the full amount of the balance with interest – request in writing and include name/address to send the refund
 - DMHAS Projects: Owner must return balance to DMHAS
 - RRH Projects: Owner must return balance to Participant
- For more information see the [CT Judicial Branch page on rental security deposits.](#)

Vacancies and Retention of Assistance

- Rental Assistance may continue:
 - ✓ A maximum of 30 days from the end of the month in which the unit was vacated, unless unit is occupied by another eligible person.
 - ✓ When a participant is staying in an institution for 90 days or less.
- If the qualifying household member has died or been institutionalized for more than 90 days, assistance may continue for remaining household members until lease expiration.





Property Damage – Rental Assistance

- May use CoC RA funds in an amount not to exceed 1 month's rent to pay for unit damages caused by participant
- Limited to one-time cost per participant (exception may apply in YHDP)
- Only allowable at the time of exit from a housing unit



Zoom Poll

- 1. Select the accurate statements below:**
 - It's the landlord's job to enforce the lease.
 - It's CoC project staff's job to help participants to comply with their lease.
 - Eviction/unit loss results automatically in termination from the CoC project in scattered site housing.
- 2. In which of these scenarios is a written termination notice required (select all that apply):**
 - When terminating case management services for someone that does not get a housing subsidy
 - When exiting someone who has been hospitalized for more than 90 days.
 - When exiting someone who abandoned their unit.
 - When exiting someone who moved on to a Section 8 unit.



Zoom Poll - ANSWERS

- 1. Select the accurate statements below:**
 - It's the landlord's job to enforce the lease. CORRECT
 - It's CoC project staff's job to help participants to comply with their lease. CORRECT
 - Eviction/unit loss results automatically in termination from the CoC project in scattered site housing. NOT CORRECT
- 2. In which of these scenarios is a written termination notice required (select all that apply):**
 - When terminating case management services for someone that does not get a housing subsidy CORRECT
 - When exiting someone who has been hospitalized for more than 90 days. CORRECT
 - When exiting someone who abandoned their unit. CORRECT
 - When exiting someone who moved on to a Section 8 unit. CORRECT

REMINDER: Required Forms & Documentation Checklists Available on [CT BOS Resources Page](#)

Forms:

- [DMHAS CoC Rental Assistance Documents](#)
- DOH Rapid Rehousing Documents

Checklists:

- [DMHAS CoC Rental Assistance – Required Documents Checklist](#)
- RRH – CT RRH File Checklist
- All CoC Projects - Participant Chart Requirements by Project Type





Additional PSH Requirements

HIGHLIGHTS: FOR A COMPLETE LIST SEE OPERATIONS GUIDE

New Admissions – Additional DMHAS Requirements

- Rental Assistance Housing Certificate
 - Initially 60 days from the date the certificate is issued to locate a unit
 - Housing Provider, may issue an extension for up to 60 additional days.
 - Additional extensions require approval of the DMHAS Housing and Homeless Services Unit.
- Federal Privacy Act Notice



Lease and HAP Execution – Additional DMHAS Requirements

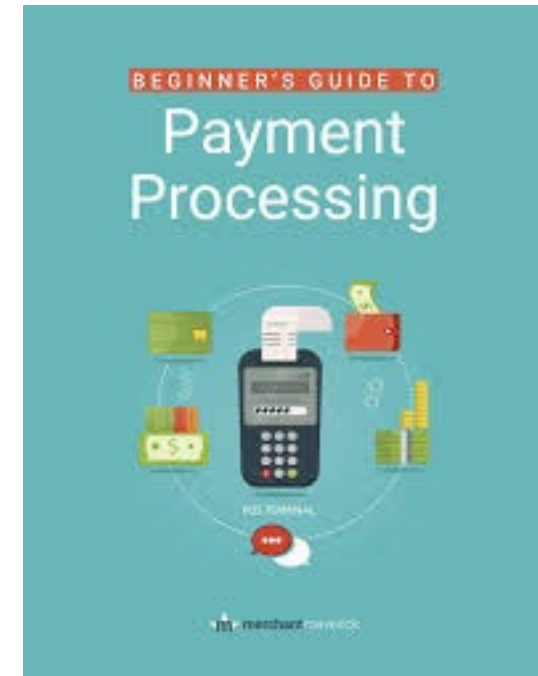
- DMHAS standard lease* is required
- Request for Lease Approval
- Owner Assurances
- HAP Contract Amendment
- Occupancy Continuation Form*
- Recertification Payment Letter



* These documents are also in the CoC RA Workbooks: [TRA workbook](#), [PRA/SRA Workbook](#)

Processing Payments – CORE-CT

- Federal W9 and State of CT Agency [Vendor Form](#) (SP-26NB) required for all owners.
- Additional forms are necessary in some circumstances
- All forms must be legible
- To avoid delays carefully follow instructions in the Operating Guide



Submission of Vendor Forms to Comptroller

- W-9 and agency vendor (SP-26) form are now submitted to CT Comptroller not DMHAS (email to osc.apdvf@ct.gov)
 - *Subject Line: New Supplier Request*
 - *Email Body: Attached please find a W9 & SP-26 for a new DMHAS supplier for entry into CORE. Please contact me if there are any questions or delays.*



Change Orders & Other changes

- Change order required if HAP must be changed, to obtain a payment after HAP has expired, or to stop payment
- Must include effective date of change, original information ("From") and changed information ("To")
- Other changes require a written request to HHSU.
- Name, tax classification, FEIN changes also require a new W9 and SP-26NB
- Building sales require a change order to stop payment and a new W9 and SP-26NB





Final Questions & Suggestion?

THANK YOU FOR PARTICIPATING

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