

Balance of State Continuum of Care Program Standards for CoC-Funded Rapid Re-Housing Programs **Seeking Comment & Feedback**

The Balance of State Continuum of Care developed the following CoC-funded Rapid Re-Housing Program standards to insure:

- Program accountability to individuals and families experiencing homelessness,
- Program compliance with HUD rules,
- Program uniformity, adequate program staff competence and training, specific to the target population being served.

SECTION 1

DEFINITIONS:

Family - Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. See 2CFR§ 5.403.

Homeless – To receive **CoC Rapid Re-housing (CoC-RRH)** assistance, though, individuals and families may be defined as homeless under any of the following categories included in the Homeless Definition Final Rule:

- Literally homeless (Category 1).
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (Category 4).

The CoC Program Notice of Funding Availability (NOFA) may impose additional eligibility requirements that are not reflected in the regulations. Projects funded to carry out RRH assistance under the CoC program must follow both CoC Program NOFA and regulatory requirements.

Rapid Re-Housing – A program designed to help individuals and families exit homelessness as quickly as possible, move to permanent housing, and achieve stability in that housing. Rapid re-housing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety), and the resources and services provided are typically tailored to the unique needs of the household. The core components of a rapid re-housing program are housing identification and relocation, short-and/or medium-term rental assistance, move-in (financial) assistance, and case management and housing stabilization services. See 24CFR§578.37(a)(1)(ii) & *Core Components of Rapid Re-Housing*, National Alliance to End Homelessness

(1) Are there definitions we are missing that should be included?

SECTION 2

PERSONNEL

STANDARD: The program shall be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

CRITERIA:

1. The agency selects, for its service staff, only those employees and/or volunteers with appropriate knowledge or experience of working with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
2. The program provides training to all paid and volunteer staff on both the policies and procedures employed by the program and on specific skill areas as determined by the program.
3. All paid and volunteer service staff participate in ongoing and/or external training and development to further enhance their knowledge and ability to work with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
4. For programs that use HMIS, all HMIS users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
5. Agency staff with responsibilities for supervision of the casework, counseling, and/or case management components have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
6. Staff with supervisory responsibilities for overall program operations shall have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
7. All staff have a written job description that at a minimum addresses the major tasks to be performed and the qualifications required for the position.
8. Case supervisors review current cases and individual service plans on a regular and consistent basis to ensure quality/coordinated services.
9. The program operates under an affirmative action/civil rights compliance plans or letters of assurance.

SECTION 3

CLIENT INTAKE PROCESS

STANDARD: The program will be an active member in the Coordinated Entry system. The program will have minimal entry requirements to ensure the most vulnerable of the population are being served. The program will assist participants in locating safe, affordable housing that meets participants' needs in accordance with client intake practices and within CoC guidelines for Rapid Re-Housing Programs.

CRITERIA:

1. All adult program participants must meet the following program eligibility requirements:
 - a. The household must meet either category 1 or category 4 of the homeless definition, set forth by HUD in 24CFR§578.3.
 - b. Adult household members must participate in developing and carrying out an appropriate housing stability plan and maintain accountability of said plan.
2. Programs cannot disqualify an individual or family because of evictions or poor rental history, criminal history, or credit history.
3. The program explains the services that are available and the requirements for participation and secures a commitment to participate in program services from each adult household member prior to admitting the individual or family into the program. A copy of the program requirements are given to the household.
4. The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants must be provided with copies of all Releases of Information that they have signed, and have the right to revoke any Release of Information without penalty.

SECTION 4

PRIORITIZATION

STANDARD: Programs will determine and prioritize which eligible families and individuals will receive Rapid Re-Housing assistance.

CRITERIA:

1. The program will screen/assess each household for barriers to obtaining housing and barriers to retaining housing.
 - a. Barriers to obtaining housing only include problems that a prospective landlord could find out during the application and screening process AND could use as a reason to deny a rental application, whether or not a landlord's manner of determination and use is legal or illegal.
 - b. Barriers to retaining housing are defined by the direct impact they have had on the on the household's previous housing history, and the potential for impacting future housing.
2. The program will prioritize each applicant household using the VI-SPDAT or F-VI-SPDAT Assessment Tool based on number and severity of barriers.
3. Service prioritization must look at all programs and services within the local CoC, not just within a single agency.

(1) Is there anything you would add to the prioritization for RRH? Currently it is the highest number.

(2) Should there be clarification if the community has PSH?

(3) Should there be clarification if the community has no other options for those scoring high?

SECTION 5

PROGRAM OPERATIONS

STANDARD: The program will assist participants in locating safe, affordable housing that meets participants' needs in accordance with client intake practices and within CoC guidelines for Rapid Re-Housing programs.

CRITERIA:

1. The program explains the program rules and expectations prior to admitting the individual or family into the program. These rules and expectations should assure fairness, to avoid arbitrary decisions that may vary from client to client, or staff to staff.
2. In locating housing, the program considers the needs of the individual or family experiencing homelessness.
3. Programs will assess potential housing for compliance with CoC HUD Housing Quality Standards (HQS), lead-based paint, and rent reasonableness and fair market rent standards prior to the participant signing a lease with the landlord, and the program signing a rental assistance agreement with the landlord. See 24CFR§578.37(a)(1)(ii)
4. The program provides assistance in accessing suitable housing.
5. The program may provide assistance with:
 - a. Security deposits (up to 2 months)
 - b. First and last month's rent
 - c. Property damage (up to 1 month's rent, one time per participant)
 - d. Short-term rental assistance (up to 3 months)
 - e. Medium-term rental assistance (4 to 24 months)
6. The program signs a rental assistance agreement with the landlord. The program participant signs a lease with the landlord. The program and the participant sign a housing stabilization plan.
7. The program will pay 100% of the participant's first month's rent. Thereafter, participant contribution toward rent will be 30% of the household's monthly adjusted gross income, payable directly to the landlord.
 - a. If the household moves into housing between the 1st and the 15th of the month, that month will be considered the "first month." If the household moves into housing between the 16th and the end of the month, the following month will be considered the "first month." In this situation, the program will provide 100% of the pro-rated rent in addition to the first month's rent.

SECTION 6

CASE MANAGEMENT SERVICES

STANDARD: The program shall provide access to case management services by trained staff to each individual or family participating in the program.

CRITERIA:

1. **Case management.** Component services and activities consist of: (i) Counseling; (ii) Developing, securing, and coordinating services; (iii) Using the centralized or coordinated assessment system as required under 24CFR§578.23(c)(9). (iv) Obtaining Federal, State, and local benefits; (v) Monitoring and evaluating program participant progress; (vi) Providing information and referrals to other providers; (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.
2. **Other eligible services** may be provided including:
 - a. *Child care*
 - b. *Education services*
 - c. *Employment assistance and job training*
 - d. *Housing search and counseling services*
 - e. *Legal services*
 - f. *Life skills training*
 - g. *Mental health services*
 - h. *Outpatient health services*
 - i. *Outreach services*
 - j. *Substance abuse treatment services*
 - k. *Transportation*
 - l. *Utility deposits*** See 24CFR§578.53 for more specific information.
3. The program will re-evaluate the household for continued eligibility at least annually. To continue to receive Rapid Re-Housing assistance, a program participant's re-evaluation must demonstrate eligibility based on:
 - a. Lack of resources and support networks. The program participant's household must continue to lack sufficient resources and support networks to retain housing without CoC program assistance.
 - b. Need. The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need to maintain stability in permanent housing.

SECTION 7

SERVICE COORDINATION

STANDARD: The program will assist program participants, pursuant to 24 CFR §576.400, in obtaining appropriate supportive services and other Federal, State, local, and private assistance available for such individuals as needed and requested by the household. Staff should be knowledgeable about

mainstream programs, services in the community, and requirements pertaining to school age children – designated staff person – 24CFR§578.23(c)(4)(iv).

CRITERIA:

1. Arrangements shall be made as appropriate with community agencies and individuals for the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; chemical dependency assessments and treatment; legal services; budgeting and credit repair; and other assistance requested by the participant, which are not provided directly by the program.
2. Other homeless and mainstream resources for which, if eligible, a client should be assisted in obtaining, include: Emergency Financial Assistance; domestic violence shelters; local Housing Authorities, public housing, rent subsidies and subsidized housing; temporary labor agencies; childcare resources and public programs that subsidize childcare; consumer credit counseling service agencies; youth development and child welfare; Community Support Programs; WIC; Food Share; Unemployment Insurance; Social Security benefits; Badger Care; Medicaid/Medicare.

SECTION 8

TERMINATION

STANDARD: Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

CRITERIA:

1. In terminating assistance to a program participant, the agency must follow the due process provisions set forth in 24CFR§578.91, (1) providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (2) written notice to the program participant containing a clear statement of the reason for termination; (3) 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 (4) prompt written notice of the final decision to the program participant.
2. Termination under this section does not bar the program from providing further assistance at a later date to the same individual or family.
3. Programs are encouraged to re-house, rather than terminate assistance to households that are evicted from their housing while participating in the Rapid Re-Housing program.

SECTION 9

FOLLOW-UP SERVICES

STANDARD: The program may provide a continuity of services to all participants following their exit from the program. These services can be provided directly and/or through referrals to other agencies or individuals.

CRITERIA:

1. The program develops exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
2. The program should attempt to follow up with phone or written contact at least once after the client exits the program. A program may provide follow-up services that include identification of additional needs and referral to other agency or community resources in order to prevent future episodes of homelessness.
3. Supportive services may be provided until 6 months after rental assistance stops.

SECTION 10

CLIENT FILES

STANDARD: The documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

CRITERIA:

1. The file maintained on each participant should, at a minimum, include information required by HUD, participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, and any follow-up and evaluation data that are compiled. The case file should also include:
 - a. Documentation of homelessness,
 - b. Type of need (amount and type).
2. Client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual. At a minimum, programs must record the date the client enters and exits the program, and update the client's information as changes occur. At a minimum, non-HMIS providers must document in the file the date the client enters and exits the program, and update the client's information as changes occur. If using an HMIS comparable database this information must be included in that database.
3. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate except to project staff and other agencies as required by law. Participants must give informed consent to release any client identifying data to be utilized for research, teaching and public interpretation.
4. See 24 CFR 578.103 for record retention pertaining to CoC funds. All records must be retained for a minimum of 5 years after the expenditure of all funds from the grant under which the

program participant was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records. Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants.

SECTION 11

EVALUATION AND PLANNING:

STANDARD: Ongoing program planning and evaluation will be conducted.

CRITERIA:

1. The program has written goals and objectives for its services to meet the outcomes required by HUD.
2. The program reviews the case management, housing, and follow-up needs of program participants and the existing services that are available to meet these needs. As appropriate, revisions to goals, objectives and activities are made based on program evaluation.
3. The program exhibits due regard for participant privacy in conducting and reporting its evaluation.

APPENDIX:

(1) Should the same appendix information such as rent calculations, utility allowances, HQS be added to this? So each standard has an appendix? Or should the "Program Written Standards" have an Appendix as a whole with all of that information in it?