

Grant-Specific Policies and Procedures

Rapid Re-housing (Unified Funding and Continuum of Care)

Introduction

Five County operates a freestanding rapid re-housing program, which means that it does not directly operate a rapid re-housing program associated with a shelter. In a community where the length of stay in shelters is rising and many homeless people are being turned away, it is Five County's hope to work with shelters to house clients. The desired impact is to help homeless clients work towards self-sufficiency while freeing up shelter beds.

http://b.3cdn.net/naeh/adc8b82e3d49a50252_7dm6bk8te.pdf

All ESG grants should comply with 24 CFR part 576 and the Utah ESG Policy and Procedure Manual. All Continuum of Care funds should comply with 24 CFR 578, Utah Balance of State Policies and procedures manuals, Local Tripartite Board requirements (Five County Human Services Council), and the Community Services Block Grant (CSBG) organization standards.

Eligibility:

Literally Homeless

The client must meet the Category 1 or Category 4 – Literal Homelessness definition of homelessness as defined by HUD in order to qualify for Rapid Re-housing funding.

https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf

(see definitions sections for definition of Category 1 and Category 4 of "Homeless" definition)

Not Eligible for other Rental Assistance Programs:

Five County cannot use state homeless or COC funding to pay for section 8 rent or to duplicate any other subsidized rental assistance program (this does not apply to Section 42 Housing which is a developer tax credit rather than direct client rental assistance). Five County will also not use homeless funding to pay utilities paid for by HEAT. In short, there will not be double-charged assistance in the rapid re-housing programs.

Annual Income Assessment:

If clients receive assistance for more than a year, they must provide last 30 day income to verify they meet the 30% AMI mark to continue with the program. Staff should utilize the HUD Income Verification Calculator tool on HUD exchange and place in client file.

Most Vulnerable:

All clients must come from the top of the Community Housing list. If a client on the housing list declines to enroll in a program or chooses a different program, this must be well-documented before the next client on the list may be selected. Additionally, declining an invitation or having exited a program in the past do not constitute reasons to deny enrollment to clients. Deliberate attempts to side-door the coordinated assessment process will result in disciplinary action.

Documenting Client Eligibility for Rapid Rehousing:

There is a requirement that the eligibility of all program participants be collected before acceptance into a rapid re-housing program. In order to meet this requirement, documentation should be gathered at intake and follow the prescribed order of documentation and the forms/supporting documents must be complete. The preferred order of documentation is: 1) Third-party Verifications, including written and source documentation, and HMIS records; 2) Intake worker observations, certified in writing and retained in client file; 3 Self-Certification from persons seeking assistance with documentation of the intake worker's efforts to obtain third-party verification and reasoning why it was not able to be obtained. Once the documentation of homelessness has been received, case manager will complete the Homeless Certification – Category 1 & 4 form and the Staff Certification of Eligibility form (case manager and department head will sign this). Case manager should complete the Five County AOG Community Action Check List form in order to collect other pertinent, but not required, documentation.

Third-party verification using HMIS records has been the departmental preference since July 1, 2016. The department head will work with case managers to ensure due diligence in obtaining this documentation.

(see forms for Self-Declaration of Housing status)

(see forms for Homeless Certification)

(see forms for Staff Certification of Eligibility)

(see forms for Five County AOG Community Action Check List)

Length of Assistance

According to HUD guidelines, rapid re-housing funding sources provide short and medium-term rental subsidy. Each case should be determined separately, but not length of assistance may exceed 2 years.

HOMELESS – DEFINITIONS (24 CFR § 576.2)

Category 1 – Literal Homeless:

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 (car, park, abandoned building, bus or train station, airport, camp ground); or

- 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

Category 2 – Imminent Risk of Homelessness:

Individual or family who will imminently lose their primary nighttime residence, provided that:

Residence will be lost within 14 days of the date of application for homeless assistance; AND

- i. No subsequent residence has been identified; AND
- ii. The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3 – Homeless under other Federal statutes:

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, AND
- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; AND
- iii. Have experienced persistent instability as measured by two moves or more during the preceding 60 days of application; AND
- iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers of:
 - a) chronic disabilities, or
 - b) chronic physical health or mental health conditions, or
 - c) substance addiction, or
 - d) histories of domestic violence or childhood abuse (including neglect), or
 - e) the presence of a child or youth with a disability, or
 - f) two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4 – Fleeing/Attempting to Flee DV:

Any individual or family who:

- i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; AND
- ii. Has no other residence; AND

- iii. Lacks the resources or support networks *e.g.*, family, friends, faith-based or other social networks, to obtain other permanent housing

Chronic Homeless

The definition of Chronic Homeless is an unaccompanied homeless individual with a disabling condition who has been continuously homeless for 1 year or more, OR has had at least four episodes of homelessness in the past 3 years, where the cumulative total of the four occasions is at least one year.

<https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

A disabling condition is defined as:

1. A disability as defined in Section 223 of the Social Security Act
2. A physical, mental, or emotional impairment which is expected to be of long-continued and indefinite duration, substantially impedes an individual's ability to live independently, and of such a nature that the disability could be improved by more suitable conditions
3. A developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act
4. The disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agent for acquired immune deficiency syndrome, or
5. A diagnosable substance abuse disorder

The term homeless in this case means a person sleeping in a place not meant for human habitation (e.g., living on the streets), in an emergency homeless shelter, or in a Safe Haven as defined by HUD.

AT RISK OF HOMELESS – DEFINITION (24 CFR § 576.2)

Category 1 – Individuals and Families:

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
- iii. Meets at least one of the following 7 conditions:
 - a) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance
 - b) Is living in the home of another because of economic hardship

- c) 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
- d) 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
- e) 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
- f) Is exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution)
- g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the sub recipients approved Con Plan

Category 2 - Unaccompanied Children and Youth:

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

Category 3 - Families with Children and Youth:

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) of that child or youth if living with him or her.

- i. Section 725(2): Children and youth who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings.

Low-Barrier Housing

Five County AOG rapid re-housing policies should reflect the policies set forth by funders (including US Department of Housing and Urban Development), the Utah Homeless Coordinating Committee, the Utah Balance of State, and local LHCC addendum.

These are the current low-carrier principles which will be followed when serving homeless clients enrolled in state and HUD-funding rapid re-housing programs:

- o Access to programs is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services, or other unnecessary conditions.
- o Programs or projects do everything possible not to reject an individual or family on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”

- o People with disabilities are offered clear opportunities to request reasonable accommodations within applications and screening processes and during tenancy, and building and apartment units include special physical features that accommodate disabilities.
- o Programs or projects that cannot serve someone work through the coordinated entry process to ensure that those individuals or families have access to housing and services elsewhere.
- o Housing and service goals and plans are highly tenant-driven.
- o Supportive services emphasize engagement and problem-solving over therapeutic goals.
- o Participation in services or compliance with service plans are not conditions of tenancy, but are reviewed with tenants and regularly offered as a resource to tenants.
- o Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants' lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- o Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- o Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.
- o Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program, or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

Eviction Policy

Five County AOG has the goal of stabilizing clients in their housing. Case managers should review the tenant education resource packet with the client at move-in and inspect the apartment at least monthly. Landlord outreach should occur at least monthly, identifying and mediating poor tenant-landlord relations proactively where possible. However, this will not always be successful and some clients may face eviction.

In the event a rapid re-housing goes through the eviction process; the client is not to automatically be withdrawn from the program (please refer to policy on exiting program). Case managers should establish safety plans, work with the clients to identify new re-housing opportunities, and conduct a new SPDAT assessment as needed.

As a policy, relocation deposits, first/last month rent, a Utah Food Bank move-in box, and other related services will be offered as permitted by funding source. In some instances, a funding source may restrict additional deposit after one relocation or may not allow for damages to be paid from a specific grant. It

is important during staffing that Five County AOG staff, sub grantees, and partners identify solutions to overcome barriers to rehousing.

Exiting Clients from Program

Client does not meet the Minimum Requirements:

Although Five County will not use eviction, failure to meet a case plan as a basis of termination, all clients are expected to meet the following requirements:

Meet with Case Manager at least once in every 30 days:

Even if clients are unable to meet their goals in their housing stabilization plan, there needs to be continued discussion between the case manager and client on how the client wants to work towards their housing stability. The client will create housing stabilization plans which are good for 30 days at a time and must renew these plans with a case manager. If the client fails to meet with a case manager in 30 days or allows their housing stability plan to expire, they may be discontinued from the program.

Submit income verification documents and pay their portion of the rent (including pet fees):

Clients are expected to pay their portion of rent. In order to determine the correct subsidy amount, clients must submit income verification timely in order to calculate their portion. Calculations are made quarterly using the last 30 days income. Failure to submit documents for determining the rental amount or failure to pay after may result in discontinuation in the program.

Recertify under the 30% AMI guidelines after a year of being in the housing program:

If clients are no longer eligible, they will be discontinued from the plan.

Corrective Action Period:

If clients are not compliant with the following requirements, they must be presented the opportunity to correct these actions. The case manager must communicate with clients via two different mediums and provide 10 businesses days for clients to come into compliance.

If clients fail to be compliant with the basic requirements of the program, they must be given a standardized denial letter/email/communication and provide information on the appeal process.

The one exception from this rule is for when clients are no longer eligible due to AMI levels. Case managers should help transition and clients for the annual recertification as much as possible.

Exit planning:

To the extent possible, clients should be set up with an exit safety plan with emergency shelters and other agencies.

Client chooses to end enrollment:

Clients have the right to end participation in the program. Client should provide verbal or written notice to case manager. In these instances, there will not be an appeal process.

Client's rental responsibility exceeds rent amount:

In instances where no subsidy can be provided, the client can be exited from program (although may have case management for six months afterwards).

Emergency Transfer Policy -24 CFR 578.7(d)

Generally, Five County AOG will only cover deposit and first/last month rent for one relocation. The exception to this rule applies to those covered by section 24 CFR 578.7(d), which in many instances will be those at risk of experiencing violence.

Fees for Services

In support of rapid re-housing, no enrolled client must pay a fee for service for any Five County service (like Court Ordered Community Services).

Client Participation

Within rapid re-housing and all other Community Action programs, clients should have “maximum feasible participation” in interactions with the department and agency. Rapid re-housing clients should have strong input into their housing stabilization goals and living situations, be invited to participate in policy decisions (such as the CSBG tripartite board [a.k.a. Human Services Council] or EFSP board), and have access to customer satisfaction surveys. Clients should also be empowered by understanding the grievance process at the beginning of enrollment.

(See Case Management Plan for more information)

Related Individual

The term ‘related individuals’ means two or more persons related by birth, marriage, and/or adoption who reside together.

Unrelated Individual

The term unrelated individual means an individual who is not an inmate of an institution: (1) who resides alone or (2) who resides with one or more persons who are not related to him/her by birth, marriage, and/or adoption.

Housing Criteria

Unit Affordability and Reasonableness

Once approved for Five County Association of Governments – Community Action (FCAOG CAP) Rapid Rehousing funding, the client and the case manager can start actively applying to rentals. In order to have the rental funded by Rapid Rehousing, all of the following criteria must be met.

1. The rental should be priced around this Fair Market Rent (FMR) range. When the case manager and client are unable to find a rental with that price range, a Rent Reasonableness and Fair Market Rent Certification form will be completed and stored in client file to show that other, similar units are priced over the Fair Market Rent and the rent is reasonable for the desired rental.

(see definitions section for “Fair Market Rent)

2. We generally encourage 2 occupants per room and no more than one room per person. According to the Utah Fair Housing Act, a landlord cannot restrict fewer than two individuals per bedroom. Here are some general guidelines to assist clients when searching for housing.
 - a. 2 people per room if married/a couple
 - b. 2 people of same gender/room—if no more than 12 years in age difference.
 - c. 2 people of opposite gender/room—if both children are 5 years of age or younger.
 - d. A den or living room may be considered a room when necessary.
 - e. Funds will not be used for units that are larger than a family needs unless otherwise determined by FCAOG/DOVE/CCWCC.
3. This rental should be around the amount the client/household will be able to afford at the end of the program. If it is currently not affordable, there is an expectation that the client will increase their income in order to afford the rental. Generally, the case manager informs the client to plan on paying around 30% of their income, and full utilities, starting the second month of rent. The client is expected to pay your own utility bills, however, it can be deducted from the client’s rental portion. The case manager will also work with the client to apply for H.E.A.T assistance during Rapid Rehousing funding.
4. The client (and all household members) must be on a lease (12 months), signed by the owner or property manager. No subleasing is allowed.

The main goal of RRH is for the client(s) to obtain and sustain housing with the understanding that the client(s) will not violate the lease, meet at least monthly with the case manager, complete a monthly home visit, and pay their portion of the rent (30% of client income). If any of these occur, the client(s) may lose their housing. Five County strives to avoid creating dependency while empowering clients to achieve their potential. FCAOG CAP strives to help the clients build a habit of prioritizing their housing, therefore, funding normally requires the client to pay a portion of their income towards their rent. Starting the second month, the client contribution begins.

It’s important for the client to be aware that their case can be closed if there has been no contact for 30 days or more between the case manager and the client. The case manager must have 5 documented (in case notes) attempts at contacting the client within those 30 days prior to the case closing. Contacts can be through phone, email, home visits, or case managers/therapists at community agency/agencies.

(see forms for RENT REASONABLENESS AND FAIR MARKET RENT CERTIFICATION)

Health and Safety Standards

Units must meet basic health and safety standards to be eligible for the housing subsidy of rapid rehousing. Inspections may be completed by Five County AOG staff or authorized subgrantee recipients.

Lead Paint Inspection

In some instances, HUD requires LEAD Paint checks to be conducted and for clients to be given information about LEAD Paint.

24 CFR 578.75(b) (noting specific activities and relevant sections of 24 CFR part 35) “ 24 CFR 578.99(f) (requiring CoC-funded programs to comply with requirements in 24 CFR part 35, subparts A (disclosure), B (general requirements and definitions), H (project-based assistance), J (rehab), K (acquisition/leasing/support services/ operation), M (tenant-based rental assistance), and R (methods and standards for evaluation and reduction)); 24 CFR 578.103(a)(15) (requiring documentation of compliance)

Fair Market Rent (for reference)

Fair Market Rent is determined by Housing and Urban Development (HUD). Five County AOG rapid-rehousing programs utilize rent reasonableness rather than being restricted to Fair Market Rent. However, these numbers are still important in determining budget and determining instances where rent reasonableness is not met.

FY 2018 Fair Market Rents

FY 2018 HUD Fair Market Rent Amounts					
County	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Beaver	\$465	\$538	\$704	\$922	\$1,014
Garfield	\$461	\$524	\$697	\$1,014	\$1,022
Iron	\$502	\$577	\$697	\$1,014	\$1,196
Kane	\$594	\$687	\$898	\$1,168	\$1,287
Washington	\$613	\$683	\$863	\$1,238	\$1,520

Service Animals

Definition

Service animals are defined as dogs that are individually trained to do work or perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person’s disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA.

This definition does not affect or limit the broader definition of “assistance animal” under the Fair Housing Act or the broader definition of “service animal” under the Air Carrier Access Act. Some State and local laws also define service animal more broadly than the ADA does. Information about such laws can be obtained from the State Attorney General’s Office

http://www.ada.gov/service_animals_2010.htm

Guidelines

Where Service Animals Are Allowed

Under the ADA, State and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas of the facility where the public is normally allowed to go. For example, in a hospital it would be inappropriate to exclude a service animal from areas such as patient rooms, clinics, cafeterias, or examination rooms. However, it may be appropriate to exclude a service animal from operating rooms or burn units where the animal's presence may compromise a sterile environment.

http://www.ada.gov/service_animals_2010.htm

Service Animals Must Be Under Control

Under the ADA, service animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal's work or the individual's disability prevents using these devices. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

http://www.ada.gov/service_animals_2010.htm

Inquiries, Exclusions, Charges, and Other Specific Rules Related to Service Animals

When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may ask two questions: (1) is the dog a service animal required because of a disability, and (2) what work or task has the dog been trained to perform. Staff cannot ask about the person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task.

Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals. When a person who is allergic to dog dander and a person who uses a service animal must spend time in the same room or facility, for example, in a school classroom or at a homeless shelter, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility.

A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken. When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal's presence.

Establishments that sell or prepare food must allow service animals in public areas even if state or local health codes prohibit animals on the premises.

People with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons, or charged fees that are not charged to other patrons without animals. In

addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals.

If a business such as a hotel normally charges guests for damage that they cause, a customer with a disability may also be charged for damage caused by himself or his service animal.

Staff are not required to provide care or food for a service animal.

http://www.ada.gov/service_animals_2010.htm

Extra Deposits for Animals:

Service Animals

It is against the policies of Five County Community Action to pay extra deposits for service animals because clients with legitimate service animals may not be asked for a pet deposit. In instances where Fair Housing is violated, the case manager should work with the client to find Fair Housing Enforcement resources.

Pets and non-service animals

Clients with pets rather than service animals may elect to have pets in their unit, but will be asked to pay the difference in “pet rent” and “pet deposits.” If this is not feasible, case managers should try to connect the client with resources to relocate pets on a permanent or temporary-basis. Ultimately clients may be facing a difficult decision, so case managers should approach this situation with as much sensitively and problem-solving mind-set as possible.

Assessments/ HMIS / CSBG Data Entry

Homeless Assessments:

Category 1 and 4 (see homeless definition) will be assessed for rapid re-housing as part of coordinated assessments within the Five Counties area. It is anticipated the initial VI-SPDAT assessments will be administered by shelter partners after clients have been in shelter for 14 days (if a client is not returning to homeless) or 7 days (for clients returning to shelter). Special accommodations for domestic violence shelters can be made, in that domestic violence victims will be assessed using an alias (where the VISPDATS and FSPDATs/SPDATs show no other information but the score). Five County case managers may assist other agencies with completing assessments and can travel to meet clients, as appropriate and needed.

When unsheltered clients present themselves at Five County offices in Cedar and St. George and indicate they are homeless, VI-SPDAT and/or SPDAT assessment are conducted by Five County Community Action staff members.

All assessments will require a signed consent form for the coordinated assessment. If signed, assessment information will be available to all participating community agencies with HMIS Access. Additional CSBG consent forms will be signed in order to release information to agencies not using the coordinated assessment and/ or do not have HMIS access.

One of the most important things to know with assessments is that FCAOG CAP keeps the score confidential. The VI-SPDAT provides information on which types of housing supports / services may assist clients the best.

Once FCAOG CAP has entered the scores into the Utah Homeless Management Information System (UHMIS), they are prioritized. The score that they are assigned rates them according to what services they are available for.

(see forms for 5 Co. VI-SPDAT & SPDAT Consent)

(see forms for UHMIS Informed Consent Release Form)

There are several types of standard ASSESSMENTS available to assess a client requesting housing services (i.e. VI-SPDAT, VI-SPDAT FAMILY, SPDAT, YOUTH SPDAT, etc.).

Entering Client Information into Homeless Management Information System (HMIS):

Case managers must input services into HMIS no later than 5 days after a service has been rendered (including case management). Case notes may be entered at program exit, but should be entered no later than 5 days after a client exits a rapid re-housing program.

Note: Case management is defined as “monthly” service, meaning it is input 5 days after the end of the month.

Entering Client Information into CAP60:

If CSBG or SSBG is used as leveraging resources for rapid re-housing, data should be entered into appropriate CSBG-reporting databases at the end of the case, or at least annually during recertification.

Client Choice:

Clients are to have as much say in their housing as possible. Although Fair Market rent and housing reasonableness must be followed for Unified Funding (ESG/PAHTF) and COC funding, clients must be listened to and have as much participation in housing as possible. Ultimately, clients feeling empowered and feeling like they have choices will increase the likelihood of success after the end of the program.

Landlord Outreach:

The need to develop and keep landlord relationships is especially important. It is Five County’s goal to ensure both rapid re-housing clients and landlords are treated fairly. Five County has structured its Community Action to where separate staff work with clients and landlords, to ensure each party has an advocate.

The landlord outreach specialist, in consultation with the program director, can also increase the amount of the deposit initially to offset risk to landlords as appropriate. Landlords will need to have written policy in place to justify increase deposits that can only address criteria such as criminal history, poor credit score, bad rental history, length of employment, etc. No increased deposits can be made for any criteria based on protected classes.

If someone calls in requesting help with finding housing, the Five County staff member will make the rental list and the “housing tips” website available to the caller (as staffing allows). If the same person calls back saying they’ve been unsuccessful in finding housing, the landlord outreach specialist can also help them try to find a place.

Housing / Utilities:

Move-in Payments:

Normally Rapid Rehousing covers 100% of move-in costs. This includes application fee(s) to several rentals, double rental deposit, first and last month’s rent, and utility deposit(s) for the first month.

Prior to the client moving in, a home inspection form must be completed.

The case manager must review the Renter’s Toolkit packet and the lease with the client prior to the client being housed.

(see forms for HOME INSPECTION-PERMANENT HOUSING STANDARDS)

(see forms for HOME INSPECTION-LBP DISCLOSURE STATEMENT)

(see form RENTAL TOOLKIT)

Back Utilities

If the rental requires the client to put utilities in their name, the client needs to make sure there are no back utilities owed. If so, the client and the case manager will work towards getting those debts satisfied first. If utilities owed aren’t a barrier to housing, case manager doesn’t need to press the issue with the client.

Unified Funds cannot pay back utilities that are in collections. However, the case manager can work with collection agencies to try to mitigate fees. In some instances, CSBG funds may be used, if all other resources have been exhausted (CSBG is resource of last-resort.) This should only be done when **rent and utilities in collections become a barrier to current housing.**

Back rent in collections:

Unified Funds or COC cannot pay back rentals in collections. However, the case manager can work with collection agencies to try to mitigate fees. CSBG may, depending on approval, be used as a resource. This should only be done when **rent and utilities in collections become a barrier to current housing.**

Rental Subsidy:

Five County AOG subsidizes rent. The client must pay the highest of 30% of income or 10% of adjusted income for rent. Clients will be responsible for paying utilities. Client utility payments may be credited for additional rent subsidy, except in the instance where LIHEAP (HEAT), Emergency Solutions Grant (ESG), or CSBG have been utilized for utility payments.

(see forms REVISED COC-INCOME-ELIGIBILITY-WORKSHEET-TENANT-INCOME-AND-RENT-CALCULATION)

A rental calculation must be completed (found on CAP Server), reviewed during staffing, signed by client, and maintained in client folder. The calculation sheet should also be submitted for check/ACH requests to landlords as accounting back-up. The calculations are conducted quarterly, but may be revisited at the request of the client for unexpected challenges (job loss, new medical expenses, etc.)

Utility Subsidy:

Unless the funding source and grant scope of work covers utilities, clients should pay their own utilities. However, in accordance to HUD guidelines, utilities paid for by the client may be deducted from client portion of rent.

Case managers should also note when utilities should be covered by other funding when it becomes a barrier to remaining stability housed.

The program director may also authorize additional utility assistance as an incentive for participating in financial literacy, employment, and other programs.

LIHEAP Utilization:

Case managers are required to inform clients about utility assistance offered the Utah HEAT program (administered by Five County AOG in the region). **Clients are not required to utilize this service, but should be referred to the program.**

Length of program:

There is no defined limit to when assistance will end, providing assistance does not exceed two years. However, there may many clients able to achieve self-sufficiency within one to two months.

Tenant Counseling, Housing Stabilization Plans, and Monthly Unit Inspections:

Monthly Housing Stabilization Plans should be made to help clients make and keep goals their goals, which should move them toward stabilization. Breaking the Housing Stabilization Plan will not result in termination of the program. The case manager should use Housing Stabilization Plans to identify problems in advance. The primary purpose of housing plans is to keep clients housed and progressing.

After move-in, the case manager will also complete monthly home visits with the client. The first home visit agenda is to review the Rental Tool Kit, the lease, deliver Utah Food Bank move-in food boxes, and complete a SPDAT. The visit should also include a discussion about the client's rental portion for the following month. This should give the client enough warning and time to start saving for their portion. A home inspection will be completed monthly. The case manager will mostly be looking for these things:

- Safety hazards: blocking fire exits, unplugging fire alarm, stacked bins/boxes (could fall on children, nails on floor, etc.)
- Property kept within living standards: food on the floors or writing on surfaces (clutter is not a major issue), no holes in walls, doors, broken cabinets, broken windows, mirrors, and glass, etc. No presence of mold
- No repairs to the home needed: dripping faucets / leaking dishwashers / toilet running / dripping ceiling / etc. Client may have responsibility for repairs, if caused by them. Landlord

maintenance issues should be reported. Energy leaks (heat and cooling loss from unsealed windows and doors). Referrals to weatherization.

All subsequent home visits will include reviewing the Housing Stabilization Plan, any issues with the rental, and any complaints from the landlord (when applicable). A SPDAT will also be completed quarterly, then input into HMIS within 5 days of assessment.

<http://www.hacsl.org/wp-content/uploads/2008/05/Renter-ToolKit-1.30.14.pdf>

Animals in Rentals

Service Animals

Five County Community Action strives to live in accordance with the guidelines from the US Department of Justice as it relates to service animals. This is applicable to clients meeting on the Five County Association of Governments premise as well in housing rentals.

(see definitions section for “Service Animals” definition)

Deposit Returns:

Landlords are asked to return unused deposits back to FCAOG in order to try to provide services to additional clients. In many instances, landlords, may need to keep the full deposit to repair damages or recover costs. This is acceptable. **However, it is against Five County Community Action’s policy for the client to receive the deposit back.**

Master Leases:

Rapid Re-Housing policy prohibits funding rapid re-housing clients with master lease housing. This is a violation of regulations and best practices.

In some instances, Five County may be able to make payments to community agencies if they own apartment units directly (such as Dixie Sun Manor. If agencies own units which are already subsidized by another program, Five County will not be able to house clients in these units.

Five County AOG may provide deposit assistance to Permanent Supportive Housing (PSH) providers (primarily applies to St. George Housing Authority) with appropriate master leases for clients. However, clients must be eligible for CSBG and SSBG and are subject to the deposit assistance policies and procedures as non-homeless deposit assistance clients.

(Please see Deposit Assistance Policies and Procedures)

Discontinuation Based on Poor Tenant Behavior

Five County Association of Governments expects tenants to abide by the terms of their lease. As such, case managers should review the Renter’s Toolkit Guide and terms of the lease agreement with their client to help support good tenant behavior and set the client up for future success. The landlord outreach specialist and case manager should work together in instances where alleged client behavior risks eviction.

If a case manager determines that a client is breaking a lease, it is the duty of the case manager to help the client come into compliance with the lease, if possible.

The client may not be terminated from the program if an eviction is made by the landlord.

In instances where clients become evicted as a result of alleged/documented poor tenant behavior, Rapid Rehousing may be able to rehouse the client, even when eviction occurs, when appropriate. If clients are placed into new housing again, the case manager will review the Renter's Toolkit and lease again with client and incorporate appropriate interventions into the case plan to help the client better prioritize their housing.

When a client is rehoused more than 1 time, the Rapid Rehousing grant may still help with rental assistance, however the deposit and application fees are not covered in a 2nd rehouse.

Essential Requirements for maintaining Program Participation

HUD rules allow for termination of assistance when a program participant violates a program requirements. Three instances where termination based on poor behavior occurs are for the following:

- 1) Not meeting with a case manager within a 30 day period
- 2) Not submitting program documents needed for eligibility and client portion of rent
- 3) Not paying client portion of rent

When initiating termination proceedings, the recipient or subrecipient must:

HUD intends CoC Program recipients and subrecipients to terminate assistance only in the most severe cases. When terminating hard-to-house homeless individuals, recipients and subrecipients must exercise judgment and examine all extenuating circumstances when determining if violations warrant termination.

- Provide the program participant with a written notice including the reason(s) for the termination. Clients must have ample time to address concerns before termination is initiated, which is at a minimum 10 business days (when the Community Action Department is open for business).
- Allow for a review of the termination decision, which includes allowing the program participant to provide oral or written objections. Note: The review cannot be conducted by the person who made the original termination decision or a subordinate of that person.
- Provide prompt written notice to the program participant after the final determination has been made

Late Fees

Five County will not pay late fees due to a client's negligence (not returning documentation before the case manager's deadline or not recertifying before their rent is due). In cases of negligence, clients must pay their own late fees. Federal grants cannot be used to pay for late fees.

Case Manager Safety

It is important that the FCAOG CAP case managers be vigilante about their own safety.

Home Visits

Home visits may tell the case manager many things about the household (understanding household dynamics, where the household needs support, how the household is taking care of the unit, eliminates the barrier of transportation for the household, etc.). However, the case manager must be vigilante with their own safety while doing home visits to make sure they're in a safe environment.

Planning for the visit

The FCAOG CAP Case Manager will gather as much information and paperwork as possible about the household. The FCAOG CAP Case Manager may take the household file with them to the visit as long as it is stored behind two locks before and after the visit (i.e. in a locked suitcase in the trunk of the car). No other household files may go into the household's home except their own file. The FCAOG CAP Case Manager has a field visit kit that they take with them that includes paperwork the household MAY need, scratch paper and pens, and the FCAOG CAP Case Manager's business cards. The case manager should know where the house is prior to leaving for the home visit. If the FCAOG CAP Case Manager has safety concerns, they need to talk with their supervisor about it. It may be helpful to go in pairs for the first home visit, or when the case manager feels that safety is an issue. The FCAOG CAP Case Manager is to put the home visits on the his/her calendar and share the calendar with other FCAOG CAP staff members so they may know where the case manager was in case something happens. Cell phones are useful to have on home visits, make sure it's charged to last through the home visit.

Traveling for the visit

The case manager may want to: 1-Put all valuables out of site (in the trunk of the car) or don't bring them at all, 2-Keep the car doors locked, 3-Make sure the car has enough gas prior to arriving at the home visit, 4-Park in a well-lit and visible area, as well as backing the car into a spot, 5-Always trust your instinct about feeling uneasy/unsafe, 6-When leaving the home visit, have the car keys in hand, 7-Introduce yourself to the households' significant other, 8-If you are being followed, don't drive home. Instead, drive to a police station, hospital, gas station, or fire station where you can seek help.

During the visit

The case manager may want to: 1-Establish the goal of the visit, being clear about the schedule/time (and possibly that you're expected elsewhere at a certain time), 2-Keep your eye out for suspicious items in the house (i.e. drug paraphernalia, guns, alcohol containers, abnormal odors, threatening animals, etc.), 3-Always position yourself toward the door so you're not trapped inside, 4-Respect the household's space and ways of doing things, 5-Avoid giving out too much information (social media sites give out a lot of information about you), 6-If you are working with someone stronger than you (or the opposite gender/sex), consider meeting outside of the home in a neutral public location or pre-arrange for another staff to accompany you.

Meeting at the office

The case manager may want to: 1-Have an emergency escape route determined, 2-Arrange furniture to give you access to the exit (when possible), 3-Interview in pairs if you're working with a possibly threatening person and/or when you feel your safety is or may be threatened, 4-Use the office

procedure for help when faced with a threatening participant, 5-Keep your desk clear of objects that could be used as a weapon.

Coordinating with Emergency Shelters and Other Human Service Providers

All rapid re-housing funding should be coordinated to support transitioning households from emergency shelters and providing linkages to other services which will increase self-reliance. Some can be provided within Five County Association of Governments (such as HEAT, Weatherization, and Aging Services) while many services must be coordinated with outside agencies. It is expected that Five County staff will coordinate services appropriately.

“Side-dooring”

Side-dooring is the practice of trying to bypass coordinated entry procedures and LHCC/COC-specific policies in place to ensure coordination of services. If any Five County staff deliberately engages in the practice, they will be subject to disciplinary action.

HEARTH-ACT Coordination

All staff working with rapid re-housing grants are required to comply with HEARTH Act requirements [Please see page 54]

Subgrantee Guidelines

Monitoring

Subgrantees are required to abide by all HUD and Utah Balance of State requirements. An annual monitoring visit will be conducted by Five County AOG administrative staff to ensure compliance with HUD and Utah Balance of State requirements.

Five County AOG reserves the right to ask for pre-award risk-assessments prior to entering any contract agreement with subgrantees.

Subgrantee Responsibilities

MOU's should outline the specific obligations of subgrantees. Grantees must abide this agreement in order to be reimbursed.

Monthly Reimbursements

Subgrantees are required to submit reimbursements monthly, in order to ensure project drawdown by administrative staff.