Region

**16**

**Rapid Re-Housing Program**

**Policies and Procedures Manual**

Prepared by:

Community Action Commission of Fayette County

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Region 16 Executive Committee

# Overview

The Homeless Crisis Response Program is funded by a grant from the Ohio Department Services Agency. The Program is designed to provide rapid re-housing to homeless individuals and families. The Rapid Re-Housing (RRH) program is administered by the Community Action Commission of Fayette County. Clinton, Fayette, Highland, Pickaway, and Ross Counties currently partner under the HCRP Program and have been coordinating services as region 16 Regional Continuum of Care. Under the Homeless Crisis Response Program Region 16 COC will continue to provide services and expand collaboratively to prevent and end homelessness.

Eligible HCRP activities include financial assistance, housing relocation and stabilization services, data collection and evaluation and administrative costs. The HCRP presents a unique opportunity to transform local homeless systems and facilitate a more long-term approach to ending homelessness.

The most succinct definition is provided by HUD: Rapid Re-Housing is for ***“individuals and***

***families who are experiencing homelessness (residing in emergency or transitional***

***shelters or in a place not meant for human habitation) and need temporary assistance in order to obtain housing and retain it”*** (HUD Homelessness Prevention and Rapid Re-Housing (HPRP) Notice, March 19,2009).

**Policies and Procedures Manual Purpose**

The ***Region 16*** ***RRH Policies and Procedures Manual*** is designed to provide Region 16’s HCRP award recipients and sub recipients with detailed information regarding HUD’s, OHCP’s, BOSCOC’s and the Community Action Commission of Fayette County’s HCRP requirements. Region 16 HCRP award recipients must review this document closely to ensure full understanding of the HUD and OHCP income eligibility determination requirements, housing status eligibility determination and appropriate documentation. In addition, Ohio Region 16 HCRP award recipients are responsible for disseminating the information included in this document to staff and partner agencies to ensure that those entities are aware of, understand and comply with the requirements, as outlined.

In addition, Ohio Region 16 HCRP award recipients are strongly encouraged to visit HUD’s website (www.hudhre.info) regularly, as HUD continues to revise aspects of the ESG. The Frequently Asked Questions link is a great resource providing answers to a variety of issues encountered during the implementation of HCRP. While award recipients should consider HUD’s website as the primary source of HCRP information, OHCP and the Community Action Commission of Fayette County’s requirements may be more restrictive.

# Key Components of RRH

**1. The individual or family is currently homeless.** For persons assisted by a Rapid Re-

Housing Program funded with HCRP, HUD has defined homelessness to include:

* Sleeping in an emergency shelter;
* Sleeping in a place not meant for human habitation, such as cars, parks,

streets/sidewalks, abandoned buildings;

* Staying in a hospital or institution for up to 90 days but was homeless immediately prior

to entry into the hospital or institution;

* Survivors of domestic violence that also meet the criteria above.

**2. The “Rapid” in Rapid Re-Housing.** Rapid Re-Housing means that the household is

assisted to obtain permanent housing as quickly as possible. Households **are not** required to wait in temporary housing while they attend classes, acquire skills or otherwise demonstrate a given level of “housing readiness.” They move directly into permanent housing. If there are skills and information, they must learn to sustain their housing, those things are learned in their own housing.

**3. Assistance is needed to obtain housing**. The household is not able to find

permanent housing without assistance. Usually, this is because the household lacks the

financial resources to secure housing and/or has barriers that would cause a landlord to

deny their rental application. Without financial assistance and/or help connecting the household to landlord options, the individual or family would remain homeless much longer.

**4. Assistance is temporary.** While the assistance needed for different households will vary in

intensity and duration, Rapid Re-Housing is not a permanent support. The target

households for Rapid Re-Housing are those who have experienced a temporary (sometimes

severe) housing crisis that has de-stabilized their lives. They may have other service needs,

sometimes intensive ones, but the Rapid Re-Housing program helps them achieve stable

housing, or when necessary bridge to a longer-term housing subsidy and linkage to

community-based supports or to permanent supportive housing.

**5. Assistance may be needed to retain housing**. Assistance to retain housing can include

any combination of financial help (such as rental or utility assistance) and the support

services needed to set up a new home, meet the expectations of the lease and avoid

serious conflict with the landlord or other tenants. The intensity and duration of assistance

will depend upon the household’s prior experience in housing and the steps in their Housing

Plan. But help is not long-term. Most households are able to achieve stable housing

relatively quickly even if longer-term or specialized assistance is needed from other

community-based services to address more serious barriers.

# Principles of Rapid Re-Housing

Communities that have implemented Rapid Re-Housing recognize and seek to embody the

following basic principles in their Rapid Re-Housing initiatives:

* People move directly from homelessness to housing. There are no intermediate

programs that delay their move to housing.

* The key to successful re-housing is understanding the individual’s barriers to getting and

maintaining housing—then finding ways to eliminate or compensate for those barriers.

* Rapid Re-Housing provides the **minimal amount** of assistance—amount and length—

needed to obtain and retain housing.

* Households are empowered to make their own choices and to respond to the

consequences of those decisions. Rapid Re-Housing does not guarantee risk-free

housing and some households will fail. Participation in community based service referrals made my RRH case manager are voluntary. Participant choices are “consumer” driven.

* The focus is housing; household problems that are not directly related to housing are

addressed only when the participant chooses. This does not mean that programs

offering short or medium-term rental assistance have no expectations of the household.

Effort or progress towards obtaining a long-term subsidy or increasing income enough to

remain housed without the rental assistance is a reasonable program requirement. But

the focus, again, is directly related to housing.

* Mainstream resources are a critical part of stability for everyone living in a community.

Rapid Re-Housing helps households connect to the supportive, community-based

resources they will use long after Rapid Re-Housing services are ended.

* Landlords are a Rapid Re-Housing program’s most valued resource. If the Rapid Re-

Housing program cannot meet the reasonable expectations of landlords, many participants

will not be re-housed. Programs that adopt an adversarial attitude towards landlords are

much less likely to succeed.

* The most appropriate housing situation may involve moving in with family members who can provide financial or other support.

In summary, Rapid Re-Housing is a successful community strategy for ending homelessness.

The intent is to minimize the length of time an individual or family remains in the limbo of

homelessness and to help the household quickly re-establish stability. In the safety and

predictability of permanent housing, they are encouraged to choose how, when and where they will address other life problems or goals using mainstream resources. Rapid Re-Housing

resolves the crisis of homelessness; the rest is up to the individual or family—and their

community support systems.

All award recipients, sub recipients and partner agencies with a role in HCRP must read the U.S. Department of Housing and Urban Development (HUD) ESG Notices at [ESG Requirements - HUD Exchange](https://www.hudexchange.info/programs/esg/esg-requirements/) and comply with the requirements within.

# Assessment of Potential Participants

Region 16 RRH staff must use the region’s coordinated entry (CE) assessment to determine and document participant eligibility. This means they must enter the homeless system through each county’s determined access points. These access points are listed on the CACFC Region 16 Homeless Programs webpage and in the Regional CE Plan. The CE assessment must include documentation supporting the requirement that eligible participants be currently homeless. Documentation can be found at <https://www.cacfayettecounty.org/region-16-homeless-housing-programs/>. RRH staff must assess potential program participants to determine the level of services needed other resources available to assist the potential program participant, and the appropriateness of participation in the HCRP. Region 16 RRH must tailor the amount of assistance to the needs and circumstances of the household, so that only the minimum amount needed to obtain housing stability is provided. RRH staff must follow the region’s coordinated entry process. This means that all referrals must go through access points and complete the standardized assessment using the SPDAT tool created for prioritization in the coordinated entry process. Program admission cannot be contingent on pre-requisites such as sobriety, income, mental or physical health, housing history, medication adherence, criminal justice records (within reason), financial history, or completion of treatment. RRH staff must include the CE tab in their participant file. The CE entry process is outlined in the CE Plan found on the CACFC Region 16 Homeless Programs webpage.

1. Documentation of identity – Attempts must be made to collect at least one form of identity for each member of the household. You should never deny entry into the program for this reason. Staff should work with their local Salvation Army, local churches, or agency flexible funding to help the participant obtain the identification. This should be done for every homeless program – ES, RRH and PSH.
2. PSH Documentation – This includes the current housing status, chronic homeless verification, disability documentation and self-certification forms. Emergency shelters should begin working with participants to obtain this income documentation when they become aware the individual has a chronic homeless status. At times, to put their best foot forward, individuals do not share their entire homeless history with staff. Be sure to explain why you are asking the question and explain the resources that are available to individuals that meet the definition. PSH programs are required to have this documentation on file as a part of their eligibility process.

**Target Population & Eligibility**

The target population includes **individuals and families who are experiencing homelessness (residing in emergency shelters, hotel/motel paid by a faith based or other organization or on the street) and need temporary assistance to obtain housing and retain it.**

To be eligible for RRH, individuals must meet the category 1 homeless definition. They must also have income no greater than 50% AMI. To be eligible for a RRH referral, the VI-SPDAT should reflect a score of 4 or higher. Exceptions to this would be if the case manager can make a compelling argument as to why a SPDAT score below 4 is not an accurate reflection of the participant’s barriers. For example, if the staff knows the participants answers were not accurate based on their conversation, interactions, or ongoing relationship with the participant. Instances of this will be rare and must be carefully documented. If a participant’s score indicates that PSH is a more appropriate intervention, but no PSH is available, individual will be served in RRH.

# Category 1 Homeless Definition

Individuals or families are considered as homeless if they are:

* sleeping in an emergency shelter;
* hotel or motel paid for by a faith-based, nonprofit or government agency
* sleeping in a place not meant for human habitation, such as cars, parks, abandoned buildings, street, sidewalks, etc.;
* staying in a hospital or other institution for up to 90 days, but were sleeping in an emergency shelter or other place not meant for human habitation immediately prior to entry in the hospital or institution;
* Victim of domestic violence that meets these criteria.

# Assistance Requirements

To be assisted with Ohio HCRP funds, the target populations must:

* participate in, at least, an initial assessment and then monthly meetings with a case manager or other assessment professional and ongoing home-based case management every 30 days;
* have income no more than 50% of Area Median Income (AMI) at point of program entry. If income amounts cannot be verified at program entry, RRH projects may serve otherwise eligible and prioritized individuals and families, so long as the RRH provider believes they lack sufficient income and/or supports to obtain housing on their own. Self-declaration of income can be used to document/verify income when third party documentation cannot be obtained
* have a household income below 30 percent of Area Median Income (AMI)\* at 90 days post-entry for ongoing Rapid Re-Housing Assistance and each 90 days thereafter.
* be category 1 homeless (as defined above)
* lack appropriately identified subsequent housing options and the financial resources and support networks needed to obtain immediate housing
* be referred through the CE process that have been assessed with the VI-SPDAT. (Individuals and families entering emergency shelter without a past history of homelessness will not be assessed for service needs until they have been in shelter for at least 5 days, but no more than 8 days).

# Documentation of Eligibility

# RRH Case Managers must abide by all documentation and record-keeping requirements, including requirements for documenting homeless status and project eligibility. RRH Case Managers must document homeless status for all RRH participants.

Acceptable documentation includes the following, in order of priority:

* *HMIS* *verification* of enrollment in ES, TH or Unsheltered entry with Third-Party written verification as defined below;
* *Third-party* *written verification (on letterhead or email with contact info)* agency or business with contact information listed, that has provided services to participant & that participant reported their current episode of homelessness to them or;
* S*elf-certification* of homeless status. (This can only be used as documentation if neither third-party written nor third-party oral verification could be obtained for enrollment, and due diligence was documented).

Accompanying documents are discussed below:

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| --- | --- |
| **Living Situation** | **Type of Eligible Documentation** |
| Persons living on the street or sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation. | * Signed and dated written certification by person seeking services * Signed and dated written certification by an outreach worker |
| Persons living in a shelter designed to provide temporary living arrangements  - congregate shelters  - transitional housing  - hotels/motels paid for by a charitable organization or government program. | * HMIS shelter/transitional housing record * Written referral from previous shelter/transitional housing staff * Written referral from charitable organization or government program |
| Persons exiting an institution where they resided for 90 days or less and was residing in a place not meant for human habitation immediately before entering institution. | * HMIS shelter/transitional housing record * Written referral from previous emergency shelter stay * Written referral from institution |
| Persons fleeing domestic violence. | * Written, signed and dated verification from the participant * Written, signed and dated verification from the domestic violence service provider |

\*\*\*Please note it is understood that Self-Declaration of Housing Status, while allowed, rarely will be the only documentation of a household’s risk or actual homelessness. Case Manager is expected to work with participant to provide Third Party verification of homelessness within 30 days of program enrollment.

# Income Definition

Income is any money that goes to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member. Annual income includes the current **gross income** of all adult household members and unearned income attributable to a minor (e.g., child support, TANF payments, SSI payments and other benefits paid on behalf of a minor).

* Gross Income is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.
* Current Income is the income that the household is currently receiving at the time of application for HCRP assistance (within the past 30 days). *Income recently terminated should not be included.*

The calculation of current income at the 90-day eligibility recertification (for households receiving ongoing HCRP assistance, such as medium-term rental assistance) (see Recertification Section below) is also based on the total income the household is receiving at the time of recertification (see Timeliness of Documentation section below).

The HCRP income definition contains income "inclusions" (types of income to be counted) and "exclusions" (types of income that are not to be counted as income) for HCRP purposes. The following types of income must be counted (inclusions) when calculating gross income for HCRP eligibility purposes:

* Earned Income;
* Self-Employment/Business Income;
* Interest & Dividend Income;
* Pension/Retirement Income;
* Unemployment & Disability Income;
* TANF/Public Assistance;
* Alimony, Child Support and Foster Care Income; and
* Armed Forces Income Service Connected and Non Service Connected
* SSI, SSDI

The follow types of income are NOT counted (exclusions) when calculating gross income for HCRP eligibility purposes:

* Income of Children;
* Inheritance and Insurance Income;
* Medical Expense Reimbursements;
* Income of Live-in Aides;
* Disabled Persons;
* Student Financial Aid;
* Armed Forces Hostile Fire Pay;
* Self-Sufficiency Program Income;
* Other Income (i.e., temporary, non-recurring or sporadic income);
* Reparations;
* Income from Full-Time Students;
* Adoption Assistance Payments;
* Deferred and Lump Sum Social Security & SSI Payments;
* Income Tax and Property Tax Refunds; on a case-by-case basis with proof of

reasonable expenses;

* Home Care Assistance; and
* Other Federal Exclusions.

Note that household assets are generally not counted as income, with the exception of interest and dividend income, as indicated above. However, household assets should be taken into account when determining whether a household has other financial resources sufficient to obtain or maintain housing.

# Income Calculation

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Income guidelines are determined by the household’s annual income, as based off the past 30 days **gross income**. REMINDER: *Income recently terminated should not be included*.

To calculate annual income using current monthly gross income; use the monthly gross income as documented (paystub, award letter, etc.) and divide by 12 months, this will create an average monthly wage. Use the average monthly wage & multiply by 12 to determine annual income. This calculation of annual income will be used to determine income eligibility as set by HUD.

To determine an average wage per payment period based on hourly rate and employment status information only (F/T-40hrs or P/T-25hrs); multiply the hourly pay rate by number of hours per pay period. This is the average wage per payment period. Use the average wage per payment period to calculate an annual income with one of the following calculations:

* Weekly Pay Period: Average Wage multiplied by 52 weeks
* Bi-Weekly (every other week): Average Wage multiplied by 26 bi-weekly periods
* Semi-Monthly Wage (twice a month): Average Wage multiplied by 24 semi-monthly periods: or
* Monthly: Average Monthly Wage multiplied by 12 months.

# Verification of Income

The Self-Declaration of Income form is required to report all sources of income for each adult member of the household (18+) with corresponding income documents, or NO income for the adult participant. **NOTE:** Adult participants completing the Self-Declaration of Income form must document with check stubs, SSI statements, etc. In addition, an adult participant must complete a Self-Declaration of Income form if they have no source of income.

**A Self Declaration of Income must be completed for all adults in the household.** This is the preferred method of verifying household income. All income listed on the Self Declaration must have corresponding documentation to verify the listed income (i.e., paystubs, SSI award letters, etc.). However, if no documents are available to verify an income source, the Third-Party Verification of Income can be used.

The Third-Party Verification of Income form verifies a specific source of the applicant’s income if no paystubs or documentation from that income source is currently available. This form must be completed by the income source provider and the agency providing RRH assistance. It can be mailed or faxed directly to the income source provider. *The form should* ***not*** *be hand delivered by the HCRP applicant to their income source provider.* If there is no response from the income source provider within **10 business days**, the Self-Declaration of Income form may be used as sole income verification until third party documentation is provided. HCRP staff must document in the participant’s file their due diligent attempts to obtain third-party verification. NOTE: Detailed information about income may be found at [HPRP Documentation Checklist Templates - HUD Exchange](https://www.hudexchange.info/resource/1869/hprp-documentation-checklist-templates/).

# Timeliness of Income Documentation

The definition of income for the HCRP reflects an applicant household’s income at the time of application. Accordingly, documents and information collected to verify income should be recent. Documentation that is dated within 30 days prior to the time of application is acceptable for purposes of HCRP. However, for public assistance benefits (e.g., SSI, food stamps), a benefits statement received any time within the 12 months prior to the time of application and reflecting current benefits received by an applicant household is allowed. A copy of a recent bank statement indicating direct deposit of benefit(s) is also acceptable.

# Determining Acceptable Level of Documentation

Award recipients and sub-recipients must make a conscientious and reasonable effort to use the highest documentation standard possible. An acceptable documentation standard may be dependent on two issues: the resources of the award recipient or sub recipient providing HCRP assistance; and the type of assistance provided.

To determine the highest documentation standard that is reasonable, each HCRP award recipient or sub-recipient should review existing resources (i.e., funding, capacity, pre-existing income verification process for other programs) available within their agency. Some award recipients or sub-recipients may already have a third-party verification process in place that could be reasonably incorporated into the HCRP eligibility determination and documentation process. However, for other types of organizations (e.g., small nonprofits), a lower level of income or housing status verification and documentation may be all that is reasonable.

Establishing a reasonable documentation standard also depends on the type of service provided. For example, some income documentation requirements for one-time or emergency assistance may not be reasonable given the time-sensitive and/or short-term nature of the assistance. It may not be reasonable to delay HCRP assistance if third-party documentation cannot be obtained in time to allow for assistance to be provided and literal homelessness averted. Medium-term rental assistance (which may be provided over a period of four to eighteen months) and/or other ongoing assistance (i.e., case management) may allow for a higher documentation standard. The HCRP award recipient or sub-recipient must provide a brief written description of efforts to obtain third-party documentation in the participant case file (e.g., in case notes, participant assessment or on applicant self-declaration). HCRP staff must clearly and briefly describe in participant case files each instance when a lower documentation standard is used other than the most preferred standard. This may be completed as part of the documented participant assessment or as part of other case file documentation (e.g., in case notes, on income verification form). Detailed information about documentation may be found at [HPRP Documentation Checklist Templates - HUD Exchange](https://www.hudexchange.info/resource/1869/hprp-documentation-checklist-templates/)

**Income Documentation Standards**

Award recipients and sub-recipients are responsible for verifying and documenting the eligibility of all HCRP applicants prior to providing HCRP assistance. They are also responsible for maintaining this documentation in the HCRP participant case file once approved for assistance. Award recipients with insufficient case file documentation may be found out of compliance with HCRP regulations during a HUD, OHCP, CACFC, or another monitoring. It is important for award recipients to develop policies and procedures to ensure appropriate documentation is obtained and included in HCRP participants’ files.

For purposes of HCRP, various types of income documentation are allowable, ranging from third-party verification to applicant self-declaration. Minimum acceptable types of documentation vary depending on the type of income or housing status and circumstance being documented. When general documentation standards cannot be met (i.e. pay stubs, award letters, etc.), the following are acceptable in order of preference:

1. Written Third Party -- Verification in writing from a third party (e.g., individual employer, Social Security Administration, welfare office, emergency shelter provider, etc.) either directly to HCRP staff or via the applicant is most preferred. Written third party documentation may include completion of a standardized form, such as the “Third Party Verification of Income” form.

2. Oral Third Party -- Verification from a third party (e.g., individual employer, Social Security Administration, welfare office, etc.) provided by the third party over the telephone or in-person directly to HCRP staff. Oral third-party verification is acceptable only if written third-party verification cannot be obtained. HCRP staff must document reasons why third-party written verification could not be obtained in the HCRP participant file. Note: This is different from applicant self-declaration of income. If an applicant orally declares income,

it would fall under “applicant self-declaration” below.

3. Applicant Self-Declaration -- An affidavit of income and housing status as reported by the household is allowable but is only acceptable if written or verbal third-party verification cannot be obtained. HCRP staff must show due diligence was done to obtain third party written, or oral verification, and provide a thorough explanation as to why it could not be obtained in the HCRP participant file. This should be used in rare occurrences and not as a standard practice.

Award recipients and sub-recipients must carefully review the participant case files periodically to ensure that the documentation is sufficient to meet the eligibility criteria. Two of the most common monitoring findings are missing or incomplete eligibility documentation. Remember, specifically for housing status, determining eligibility can be a multi-level process; applicants must meet ALL criteria and evidence of this must be present in the case file.

# Region 16 Asset Policy

Assets will be included in the documentation of HCRP Eligibility. Applicants are required to disclose all applicable assets during assessment. Assets must be spent down to the amount of one month of their current housing expenses prior to application of HCRP assistance with special consideration given to the participant’s income and expenses for the current period. Participant files should document the value and income earned from assets, the participant’s monthly budget, and the participant’s need.

# Treatment of Assets

Assets are cash or material items that can be converted to cash quickly. They include both real and/or personal property and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant.

Assets do not include:

* Necessary personal property;
* Assets not accessible to family;
* Business or farming operation assets;
* Equity in manufactured homes; and
* Vehicles/special equipment for disabled persons.

HUD has not established requirements for how assets are to be treated in determining whether an applicant household has financial resources to address their housing need and what, if any, amount of assets held by an applicant household must be spent down in order to qualify for HCRP assistance or to determine the appropriate type or level of HCRP assistance. Instead, award recipients and sub-recipients are required to determine whether an applicant household must spend down its assets and, if so, by how much, for the purpose of determining eligibility and the type and level of HCRP assistance. Award recipients may establish a separate policy for each local Continuum of Care (CoC) where one or more sub-recipients operate. In all cases, policy related to treatment of assets must be uniform across all sub-recipients within a local CoC and determinations must be applied consistently to all applicant households within the CoC.

Assets include:

* Bank accounts;
* Life insurance policies;
* Lump sum payments\*;
* Retirement/pension funds\*\*;
* Personal property held as investments;
* Trusts;
* Stocks, bonds, mutual funds, etc.;
* IRAs, Keogh, annuities, and similar retirement accounts;
* Franchises; and
* Assets disposed of for less than fair market value (selling a car/house/piece of property for less than market value).

\*Lump sum payments received by an individual/family are generally counted as assets. Normally, when a person receives a lump sum (large amount of money) – the household will place the money into a checking or savings account, purchase stocks/bonds or purchase a certificate of deposit. A lump sum payment is counted as an asset only as long as the family continues to possess it. If the family uses the money for something that is not an asset –

a car or a vacation or education – the lump sum must not be counted. Examples of lump sum payments include the following:

* Cash from the sale or assets;
* Capital gains;
* Lottery winnings paid in one payment;
* Inheritances;
* Insurance settlements (including Social Security (SSI/SSDI), health and accident insurance, workers compensation, personal and property losses; and
* Any other amounts that are received in one-time lump sum payments.

\*\* Retirement/Pension Funds -- Balances held in retirement accounts are counted as assets if the money is accessible to the family member. For employed individuals, accessible amounts are counted even if withdrawal would result in a penalty. However, amounts that would be accessible only if the person retired are not counted. IRA, Keogh, and similar retirement savings accounts are counted as assets, even though withdrawal would result in a penalty. Include contributions to company retirement/pension funds:

* While an individual is employed, count only amounts the family can withdraw without retiring or terminating employment
* After retiring or terminating employment, count as an asset any amount the employee elects to receive as a lump sum.
* Include in annual income any retirement benefits received through periodic payments.

# Real Estate Considerations

If a family owns real estate, it may be necessary to consider the family’s equity in the property as well as the expense to the sell the property. Example: the family owns a piece of property with a market value of $15,000, and owes $3,000. The cost to dispose of the property would be $1,500 (10% of market value to sell property). To determine the cash value:

$15,000 (market value) - $3,000 (amount owed) = $12,000 – $1,500 (cost of selling property) = $10,500

Cash Value = $10,500.

For more information, refer to the Coalition on Homelessness and Housing in Ohio training site [http://cohhio.org/boscoc/tr-rrh/.](http://cohhio.org/boscoc/tr-rrh/)

# RRH Prioritization

RRH staff must prioritize assistance for individuals and families with the greatest needs, who cannot otherwise be served by a more intensive resource. Level of need is primarily determined by the results of the VI-SPDAT that is completed while individuals and families are in emergency shelter (or in an unsheltered location). In cases where the VI-SPDAT score indicates that an individual or family has a level of need that would likely best be addressed by Transitional Housing (TH) or Permanent Supportive Housing (PSH), but that resource is not immediately available, RRH providers should strive to serve these individuals or families with RRH assistance. Returning RRH participants may be prioritized for assistance where possible, assuming they continue to be eligible (including that they are currently literally homeless). Eligible homeless Veterans who are not eligible for VA funded programs, such as the Supportive Services for Veterans and their Families (SSVF) program, are prioritized for RRH assistance if their VI-SPDAT score and housing barrier support the prioritization.

Prior to taking anyone into the program, RRH staff may run an RRH Prioritization report if community needs are exceeding fund availability. This report is available through the RMinor reporting tool and will be provided at prioritization meetings by the HCRP Coordinator or Director.

Staff should take individuals into the program based upon the following list of priorities:

1. Chronically homeless individuals/families with the most severe service needs and/or VI-SPDAT score, if there is no PSH available.
2. Chronically homeless individuals and families with the longest history of homelessness, if there is no PSH available.
3. All other chronically homeless individuals and families, if there is no PSH available.
4. Homeless individuals and families with a disability with the most severe service needs and/or VI-SPDAT score.
5. Homeless individuals and families with disabilities with long periods of continuous or episodic homelessness.
6. Homeless individuals scoring 4-7 on the VI-SPDAT, serving those with the highest scores first.
7. Households with the longest current episode of homelessness
8. Households with the longest cumulative history of homelessness

The Region 16 CoC is dedicated to eradicating veteran homelessness and putting an end to domestic violence. CACFC will prioritize veterans over non- veterans and victims over non-victims in each prioritization category listed above. Essentially, this means that if two households present for assistance and both fall under the same order of priority (e.g., both chronically homeless and fall under Priority 1), but one is a veteran household or victim of domestic violence and the other is not, the veteran or DV household should be prioritized first. In general, the CAC will prioritize veteran households that are not eligible for VA housing or services. If we have both a Veteran and a domestic violence victim in the same category with the same VI-SPDAT, we will serve the Veteran first, per the BOSCOC standards, provided that they are not eligible for VA funded services.

# Enrollment

To determine enrollment, the RRH Case Manager will review the Coordinate Entry materials provided by the referring agency and verify the participant is next to be served on the RRH prioritization list (if applicable). The enrollment assessment includes all program eligibility criteria. The Case Manager will then refer to the HCRP website at [https://www.cacfayettecounty.org/region-16-homeless-housing-programs/](https://www.cacfayettecounty.org/region-16-homeless-housing-programs/%20) to obtain the current RRH enrollment forms.

Included in the RRH Enrollment tab are the following:

* Accepted referral (HMIS printout)
* Region 16 CSBG (can also be completed within OCEAN)
* Services and Participation Agreement
* Housing History Assessment
* Self Sufficiency Action Plan – should be housing focused
* Budget Worksheet– used to determine rent amounts to be paid
* Housing Search Case Plan – set up responsibilities for housing search process
* Services Tracking Form (to track initial referrals & services)
* Confidentiality Agreement
* HMIS Entry (HMIS print out)
* Staff Certification of Eligibility

Once the enrollment assessment is complete, the RRH Case Manager will enter the participant into HMIS within five (5) business days. The household will be logged on the Enrolled excel file to ensure entry into HMIS and inclusion on the monthly report. If the participant has any missing assessment information, steps must be taken and documented to obtain missing program forms. If identifying documentation is missing, staff must work with flexible funding sources to obtain these for the participant.

**Confidentiality Policy**

It is essential that all employees have the commitment to confidentiality. HCRP staff is required to protect all confidential information, file it properly while not in use, and only discuss such information with those who have a legitimate need to know. Information in private participant files, either electronic or hard copy, shall not be given to any outside agency or person unless the person whose file is involved gives written, signed authorization. Participants are prohibited from reviewing records other than their own.

Homeless services have several legal and ethical responsibilities in the management of participant information and data collection. This policy will cover homeless program participant rights and homeless program personnel’s responsibilities as it pertains to participant confidentiality.

Participant Rights –

1. Homeless program participants have the right to refuse to supply any information they see fit. The HMIS privacy and consent should be posted in a location where it can be read by the participant, explained verbally, and each participant should be given a copy.
2. Homeless program participants have the right to know what instances it is appropriate and required by law for confidentiality. The participant confidentiality form covers these instances. If the participant is a danger to themselves or others program staff should discuss it with their supervisor and report the issue to the proper authorities. Staff should explain these exceptions plainly and give participant’s copy of the confidentiality form.
3. Homeless participants may revoke their consent at any time.

**Confidentiality Procedures (Staff Responsibilities)**

* Do not disclose to anyone the name and identity of participants unless it is necessary for the purpose of providing services. Take caution of disclosure to family, friends, or other agencies.
* Do not discuss a participant situation with non-staff. This includes telephone calls or messages from participants. Be especially careful about discussing a participant or his/her situation openly in front of others.
* Do not leave telephone messages, notes, or faxes in an open area where they can be read.
* Do not leave electronic participant files or e-mail messages open on a computer screen. Then the staff member is finished with the file, the document must be closed.
* All participant and personnel files must be kept in locked cabinets away from public access. They must be further protected by being in a room with a locked door.
* Incoming fax messages with participant information shall be immediately removed from the fax machines, closed so that the information cannot be read, and given to the person to whom the fax is addressed.
* Passwords to electronic participant files may not be stored in the office where they can be accessed.
* Take care not to disclose damaging information to a participant’s landlord. Staff must keep the landlord informed when tenant issues arise, but your main duty is to the participant. To discuss the participant with the landlord, staff must have a signed release.

# Service Delivery Model

# Region 16 Coordinated Entry

Through its receipt of Emergency Solutions Grant funding, the Ohio HCRP Region 16 is committed to preventing and ending homelessness when possible. We will employ a housing first response to homelessness in our respective counties. To ensure regional continuity and equal access to services, Region 16 will participate in the Coordinated Entry process. Each county designated Access Point will complete the required diversion process on any individual(s) who report as homeless or at risk of homelessness. RRH staff will obtain the completed diversion assessment from the Access Point providing the referral.

All HCRP providers in the region will be required to complete the Diversion Assessment and agreed to the utilization of the Shelter Diversion Assessment during HCRP planning.

Participant File

RRH projects utilize appropriate program tools/documents to help ensure compliance with all federal and state requirements. The RRH file is maintained on the Homeless Crisis Response Program website [at https://www.cacfayettecounty.org/region-16-homeless-housing-programs/](file:///C:\Users\CACFC-DB\AppData\Roaming\Microsoft\Word\at%20https:\www.cacfayettecounty.org\region-16-homeless-housing-programs\);

* Recertification Document
* Participant Exit Form
* Services and Participant Agreement
* Documentation of Rent Reasonableness, Inspection, Auditor’s printout
* Budget (used every month and provides space to calculate rent contribution from both the participant & RRH project, as well as space to provide an explanation for considering extenuating circumstance to alleviate participant rental obligation for that month)
* Copy of signed Lease
* Lease Review
* Rental Assistance Agreement
* Housing History Tool (standardized for the Ohio BoSCoC) helps determine the barriers that may impede housing location and stability and provides foundational information for the creation of a Housing Stability Plan.
* Self Sufficiency Plan (standardized for the Ohio BoSCoC) helps identify and track progress on goals related to obtaining and maintaining housing. It can also help RRH program staff determine when RRH assistance ends.
* Direct Client Assistance Tracking (standardized for the Ohio BoSCoC)

**Best Practices in RRH Projects**

Housing FirstHousing First emerged as an alternative to the linear approach in which people experiencing homelessness were required to first participate in and graduate from short-term residential and treatment programs before obtaining permanent housing. In the linear approach, permanent housing was offered only after a person experiencing homelessness could demonstrate that they were “ready” for housing. By contrast, Housing First is premised on the following principles:

* Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.
* All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period, while others may need more intensive and long-term supports.
* Everyone is “housing ready.” Sobriety, compliance in treatment, or even criminal histories is not necessary to succeed in housing. Rather, homeless programs and housing providers must be “consumer ready.”
* Many people experience improvements in quality of life, in the areas of health, mental health, substance use, and employment, because of achieving housing.
* Participants experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
* The exact configuration of housing and services depends upon the needs and preferences of the population.

Based upon these philosophies, Region 16 RRH must utilize housing first practices and be fully compliant with the Homeless Program Standards. This means adhering to housing first practices throughout the duration of assistance, including at program entry, after enrollment, and upon case closeout.

Acceptance into an RRH project cannot be denied for the following: zero income, the individual or family refuses to accept services beyond the monthly case management requirement, sobriety, or criminal history.

Leases and occupancy agreement cannot include provisions that would not be found in a standard rental agreement. For example, a landlord may not require that the renter participate in supportive services as a condition of their lease.

Region 16 RRH housing first programming must include the following elements:

* Rapid exits from homelessness (not waiting for them to obtain income or prove readiness)
* Minimal barriers to program entry. We can conduct background checks, but only to ensure there are no active warrants present or to determine if there is a pattern of violent and sexual offenses that may put staff or other participants at safety risk.
* Voluntary supportive services. Participants cannot be required to meet with staff more than once a month to complete the required monthly reassessment of service needs. Participants are expected to actively participate in their program services and provide all required documentation. However, not making progress on their housing stability plan or applying for benefits is not a reasonable, singular reason to exit someone from the program on its own; case managers can still attempt to offer services. Program participants should be aware of services the Case Manager can offer them to assist them in successfully maintaining their housing stability. Examples include: budget counseling, life skills assistance, linkage to employment and income supports, and referral to services based upon individual needs.
* Housing focused assistance. Case managers should focus on addressing any barriers that directly impact the participant obtaining or maintain housing.

Harm Reduction

RRH projects follow harm reduction practices when working with individuals or families with substance abuse issues.

* If substance abuse concerns arise for an RRH participant, or impacts the housing stability of participant, case managers will strive to connect participant with substance abuse services.
* If evidence of RRH participants engaging in illegal behavior in an assisted unit is determined, program assistance may be terminated if participant is unwilling to stop the illegal behavior.
* RRH projects may choose to hold units open for up to 90 days for RRH participants needing brief institutional stays, including in-patient substance abuse treatment.

RRH Program Staffing and Training

1. Partner agencies must adequately staff Region 16 RRH with qualified personnel to ensure quality service delivery and effective program management.

* RRH staff have appropriate knowledge of or experience working with individuals and/or families experiencing homelessness.
* RRH projects maintain written job descriptions that address the major tasks to be performed by each position (See job description in the appendices of this manual)
* RRH projects provide standardized training on best practices to all new RRH staff

2. Within 1 month of their start date, RRH Case Managers will receive standardized training on the following: BOSCOC Onboarding Toolkit, this policy manual (including its safety protocol), landlord/tenant law, and coordinated entry and case management.

The HCRP Coordinator is responsible for overseeing this effort in conjunction with the RRH Case Manager’s direct supervisor.

The onboarding toolkit for training new staff is located at <https://cohhio.org/member-services-2/boscoc/boscoc-onboarding-toolkit/>.

They should also review information and all of the trainings located within the Rapid Rehousing Toolkit. <http://cohhio.org/boscoc/tr-rrh/>. Staff should focus on housing identification, financial assistance and coordinated entry. Best practices are discussed in the next section and are due within six months of the start date.

Next, new RRH staff will meet with the HCRP Coordinator for in-person training. This will be followed by shadowing another case manager for two days. This training must include a home visit and an assessment.

3. RRH projects ensure all new RRH program staff are trained within 6 months of their start date on the following best practices, at minimum:

* Housing first practices - <https://cohhio.org/member-services-2/boscoc/toolkit/#HousingFirst>
* Harm reduction practices - <https://cohhio.org/member-services-2/boscoc/toolkit/#HarmReduction>
* Trauma-informed care - <https://cohhio.org/member-services-2/boscoc/toolkit/#TraumaInformedCareResources>
* Progressive Engagement - https://cohhio.org/member-services-2/boscoc/toolkit/#ProgressiveEngagementResources
* Motivational Interviewing - <https://cohhio.org/member-services-2/boscoc/toolkit/#MotivationalInterviewingResources>
* Domestic Violence - <https://cohhio.org/wp-content/uploads/2018/10/Protecting-Survivors-Of-DV3-Read-Only.pdf>
* Completion of training is documented by RRH program management on the

Staff Training form and kept on file.

Staff must also watch the appropriate webinars available on the COHHIO website. These are available at <https://cohhio.org/member-services-2/tta/current-training-materials/>.

Region 16 RRH encourages homeless program staff to engage in annual continuing education. If a Case Manager consistently fails to meet BOSCOC Performance Standards, they may be required to recomplete onboarding and/or best practice training. Continuing education activities should be submitted to the HCRP Coordinator monthly with the board report.

### Case Loads for staff

RRH projects maintain appropriate caseloads for RRH case management staff. RRH full-time case management staff charged with providing case management and services to RRH participants should carry a caseload of no more than 35 households at any given time. A part-time case manager (20hrs/week) may not exceed a case load of 16.

When serving households with greater barriers or challenges, namely individuals that would otherwise qualify for PSH, caseloads may not exceed 15 households at a given time. An exception to this is provided if services are primarily provided by a partner agency. One PSH eligible participant should be counted as two participants working towards the case load.

Homebased Case Management Safety Policy

RRH projects adhere to all of the following practices to help ensure safety of staff:

* RRH staff determines appropriateness of home visit, every time they visit.
* Prior to any home visit, RRH staff informs relevant staff/colleagues of the appointment including providing the address, scheduled length of the visit, and expected time of return to the office. This information is maintained on the document titled “Out of Office Log.”RRH staff record details of all home visits in a daily log that is accessible to all homeless program staff at their home agency.
* RRH staff verify visit date & time with participants before leaving for the home visit to determine if it might not be a safe time for a visit.
* All RRH staff conducting home visits always have cell phones with them during work hours while performing home visits.
* All RRH program staff share their personal cell phone numbers with fellow staff so that all staff can contact each other as needed.
* Lack of access to a cell phone and/or cell phone service may limit home visits.
* RRH staff keeps cell phones sufficiently charged, accessible, and operable during work hours.
* As warranted, more than one RRH staff person may participate in home-based case management meetings with a participant. This may be done in cases where concerns have arisen or where new staff is being trained.
* As warranted or desired by the program participant, visits can take place at public locations. Case Managers must ensure participant confidentiality by finding locations that conversations are not overheard, such as; a booth or table in a restaurant, in the corner at a library, or in the break room at the individual’s place of employment are examples of acceptable locations.
* If for some reason emergency circumstances do not allow for the update and sharing of the home visit log, the Case Manager must notify their supervisor via text all the details required on the home visit log.
* Do not visit any home where there is risk of injury occurring or you feel you may be at risk. Take into consideration any violence that has occurred in the home in the recent past and whether the perpetrator is at the home or likely to return.

**Meeting with Participants**

* Park the vehicle so it cannot be blocked in and in a position that facilitates a quick exit.
* Before entering the home, take a quick visual assessment for any potential threat to personal safety. Consider: arguing, use of alcohol or other drugs, coherent, showing physical or verbal signs of agitation, aggression, or other unusual and atypical behavior, or presence of weapons.
* Take note of the layout of the home and exit routes.
* If at any time before or during the visit you feel unsafe, make a polite excuse and leave promptly.
* If a medical emergency occurs on a home visit call 911 and wait for help to arrive.

**Dealing with Threatening or Dangerous Situations**

* If you become suspicious of danger or are threatened before leaving your vehicle:
  + Ensure windows are closed and doors locked and keep the engine idling.
  + If available and safe to do so, use the mobile phone to report the situation.
  + If you are unable to drive away, sound the car horn to attract attention.
  + If you can drive away proceed to the nearest police station or your agency.
  + Do not leave the car until it is safe to do so.
* If a threatening or dangerous situation arises during your visit:
  + Attempt to defuse the situation, speaking calmly and in a conciliatory manner
  + Discontinue the visit, and as soon as practical, make polite excuses and leave
  + If you are unable to leave, suggest that you call the agency to say you will be late. If at all possible, use the agreed organizational code words to alert your team that a threatening or dangerous situation is occurring
  + Once you can leave, drive a safe distance then contact the agency or the local police and report the incident and request assistance if appropriate.
  + Seek medical treatment immediately if you need it.
  + If a person visiting a home does not return at the appointed time or notify a later return, agency staff must first call their mobile phone, then the home they were last meant to be at, and then drive by the location to assess. If unresolved, call the police.

## **Housing Identification Services Overview**

The RRH Housing identification core component is comprised of activities associated with working with landlords and/or property managers (referred to as landlords hereafter) to expand and retain RRH housing options, and activities associated with working with RRH participants to overcome housing barriers and identify housing options.

Landlord Recruitment/Outreach

RRH projects engage in intentional and specific landlord recruitment activities to help ensure they have access to ample housing options that are accessible to RRH participants with significant housing barriers. Examples of landlord recruitment activities may include distribution of the Landlord Benefits form, annual training on fair housing and current community programs, and/or driving around the community and writing down non-published housing openings by looking for signs. Case Managers should constantly be making efforts to meet one-on-one with landlords in the community to explain the program and to explain what we can do to support them when they help us house individuals with significant barriers to housing. Case Managers should document their efforts to engage new landlords into the program and submit that with their monthly board report.

Case Managers must provide support to landlords who are housing RRH participants to help ensure that landlord/tenant issues are addressed quickly, effectively, and in a manner that helps preserve access to quality housing options. Case Managers should attempt to help resolve conflicts around lease requirements. When RRH housing units cannot be retained, try to negotiate move-out terms and mediate efforts of relocating RRH participants to another unit without an eviction if possible.

Case Managers should maintain consistent communication with landlords to ensure they do not have any needs or issues with the program or its participants. They should respond within one business day to landlord calls about serious tenancy issues.

### Housing Resource Guides

RRH projects track housing units and landlords that can assist RRH participants. The information for this tracking is provided through resource guides that are located on the CACFC Homeless Programs webpage. When updates are made, programs will send the updated copy to the HCRP Coordinator. RRH projects maintain potential housing options in the community. Housing Resource Guides are available to all RRH program staff that assist with housing identification and landlord recruitment. RRH Housing Resource Guides identify which landlords are willing to work with higher needs households, identifies any unique requirements, and any other important information.

### Identifying Housing for Participants

RRH projects can provide support to participants by helping them identify housing units and develop plans to overcome the most critical housing barriers. Housing identification services should be provided on the progressive engagement model. This requires more than a Case Manager simply giving a Housing Resource Guide to the participant. The Case Manager should utilize the Housing History form, VI-SPDAT, and the Individualized Housing Search Case Plan to determine the appropriate level of services necessary to rapidly re-house the family. Housing barriers can be addressed through the Housing Search Case Plan and the Housing Stability Case Plan documents.

RRH project also educate participants on the obligations of their lease agreement, as well as the elements of landlord/tenant law. RRH projects should also seek to have participants contact the project first if issues or concerns with the housing unit or landlord arise; then RRH project staff can work with participants to try to preserve the housing unit or develop a plan for moving into another unit while avoiding eviction. Housing identification services should be provided on the progressive engagement model

During the RRH enrollment assessment, the Case Manager will review the forms and determine what level of need exists. If the household scores within the PSH range on the VI-SPDAT, the minimum amount of assistance would be to practice discussing criminal history or past evictions in a manner that shows that the participant takes responsibility for their actions and has a plan to avoid a repeat of that behavior. The highest level of care would be to call landlords and set up the appointments to view the housing and to go with the program participant. It is likely this occurrence would be rare, but if an individual fails to move to the housing approval phase it is expected that the Case Manager would have exhausted the full range of actions listed in the individualized housing search case plan. Case Managers should also make referrals to local transportation that will assist program participants in getting to and from housing appointments.

## **Removing Landlords from Housing Resource Guide**

Landlord partners that have a history of not working to bring their housing to habitability standards, fulfilling their legal responsibilities or practicing fair housing should be removed from the Housing Resource Guide. If program participants connect with one these landlords independently in their housing search, the Case Manager should explain the housing standards and encourage them to pursue other housing options with different landlords.

RRH projects screen out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices.

### RRH Core Component: Financial Assistance

The RRH Financial Assistance core component is comprised of activities associated with determining the amount and duration of rental assistance and other financial assistance that is provided to RRH participants, and the activities associated with making payments for rent, security deposits, and utilities.

There are two key principles, grounded in the housing first philosophy, that guide the provision of financial assistance in RRH projects:

● Rent and move-in assistance needs to be flexible and matched to the needs of the participant to move participants into permanent housing as quickly as possible (21 days is the goal).

● In order to serve the largest number of homeless participant’s possible, RRH projects should provide the least amount of assistance possible to stabilize participants in permanent housing quickly.

Case Managers must engage in all the following Financial Assistance services:

* Determine the estimated amount and duration of rental assistance on the Services & Participation Agreement in the Enrollment tab.
* Determine the amount of the security deposit & possible first month’s rent on the Rental Assistance Agreement in the Financial Assistance tab. (Included in this calculation, the Case Manager should deduct the costs the program participant will pay for necessary household items and moving costs.)
* Processing payments to landlords, which include providing payments directly to the landlord for rental assistance, utility payments, and any other move-in related costs, as allowed, and as cost effectively as possible.

Rental assistance calculation takes place at program enrollment, inspection and then during the monthly assessment. This is calculated monthly by utilizing the Budget form with other required documents to verify income vs. expenses (i.e. pay stubs, bank statements, receipts for household purchases or expenses, utility bills, etc.).

**Calculating Financial Assistance**

The Budget form compares the program participant’s expenses versus their income, and whether they have the ability to pay a portion of their rent. To serve as many households as possible, case managers must require a contribution toward rent whenever it is possible. The following is an example of a time where it is **not** possible to contribute:

‘Participant X’ has income but also needs to pay for repairs to keep their car operable, as they rely on their car for transportation to/from work. In this case, it may be appropriate NOT to require a tenant rent contribution for this month to allow the participant to pay for needed car repairs that contribute to employment and income sustainability.

Where RRH projects have determined that participants have BOTH income AND the ability to pay a contribution towards rent, participant tenant rent contribution is determined in the following way:

* Participants with income below 30% AMI – Using the Budget tool, it can be determined what income the participant must contribute to rent based on the reported income versus expenses. When there are funds left, the RRH participants contributes at least 30% of the household’s monthly adjusted income towards rent.
* Participants with income above 30% AMI – Using the Budget tool we determine what income the participant must contribute to rent. When there are funds left, RRH participants contribute at least 50% of the household’s monthly adjusted income towards rent. Please note: Participants above 30% AMI are not eligible for ongoing RRH assistance after 90 days.

RRH participant contribution is determined in accordance with section 3(a)(1) of the US Housing Act of 1937 (42 U.S.C. 1437a(a)(1)). Details can be found here: <https://www.gpo.gov/fdsys/search/pagedetails.action?packageId=USCODE-2010-title42&granuleId=USCODE-2010-title42-chap8-subchapI-sec1437a>.

RRH participant income must is calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Details can be found here: <https://www.gpo.gov/fdsys/granule/CFR-2011-title24-vol1/CFR-2011-title24-vol1-sec5-609>.

If an RRH participant has no income, then no rent contribution is required. This must be documented on the Budget tool. In general, RRH projects should strive to increase participant rent contribution over time whenever possible, to help prepare participants to fully manage rental costs once the RRH financial assistance ends.

**Duration of Assistance**

The RRH case manager should not indicate that a specific amount of financial assistance or duration of financial assistance is guaranteed. Participants are eligible for, but not guaranteed, financial assistance until all Inspection and Financial requirements are met.

In determining the duration of rental assistance to provide, RRH projects must do the following:

* On a monthly basis, assess participant’s financial need (including using HH Budget form and income information) to determine if additional rental assistance should be provided by the RRH project
* Ohio RRH projects may provide no more than 24 months of rental assistance to any one participant in a two-year period. Regionally, we limit assistance to 12 months. However, 24 months of assistance, over a three-year period, is the absolute maximum amount of assistance that may be provided to any RRH participant, *but should only be provided in very rare cases, if at all.*
* In the RARE occurrence that RRH serves a participant with 12 months rental assistance, RRH program staff need to do and document the following, at minimum:

1. Require twice monthly meetings with RRH participant for purposes of creating and

monitoring progress on plans to gain or increase income and/or benefits (ie, the Housing Stability Plan)

* On a monthly basis, assess RRH participant for ongoing need for assistance
* Recertify and document program eligibility every 90 days

# Recertification

All program participants must be evaluated for eligibility at least once every 90 days. The

reassessment/recertification requirement applies to all households serviced under HCRP, *including those receiving services only*. Upon reassessment, if a household no longer meets the but for requirement or other eligible requirements (e.g., income is at or above 30 percent of AMI or no longer at risk of homelessness or has other support networks or resources that will allow them to maintain housing), that household is no longer eligible for HCRP assistance. Ongoing case management for program participants is imperative in order to ensure the success transition of participants to permanent, stable housing.

Documents required in the Recertification tab are:

* Action Plan
* Recertification HMIS Entry
* Budget tool
* Third Party Verification of Income
* Self-Declaration of Income
* Staff Certification of Eligibility
* The Case Manager must make a case note that details why the household still qualifies and would be homeless but for the assistance.

# Inspections and Documentation Prior to Housing Assistance Payment

In addition, participant files must include the following, as appropriate:

* Prior to approval, evidence that a lead-based paint visual assessment or HSQ inspection was conducted for all units where a HCRP-assisted to be occupied, the unit was constructed prior to 1978, and a child under the age of six is or will be residing;
* documentation that the unit to be occupied by an HCRP-assisted household meets the habitability standards as described in Appendix C of the HCRP Notice available at

http://www.hudhre.info/documents/HCRP\_NoticeRedline\_6\_08\_09.pdf. A sample Certification Statement is available in the HRPR Housing Habitability Standards Inspection Checklist which is available on http://www.hudhre.info/documents/habitstandardschecklist.doc;

* a copy of a signed lease is required for households receiving HCRP assistance in the form of rental assistance, security/utility deposits and utility payments. All household members must be listed on a lease. Leases must be approved by the HCRP case manager/housing resource specialist and cannot include provisions for mandated service. If a Housing Quality Standards (HQS) inspection is required due to another source of funding, a lease cannot be signed until after the inspection is complete and necessary repairs are made. If the landlord agrees to lower the rent due to the need for HCRP assistance, a new lease must be signed. The rent amount, after the HCRP rental assistance ceases, could be renegotiated. Note that the habitability standards are different from the HQS used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a recipient could use either standard for HCRP compliance. Also note that the HCRP Notice does not exempt units from having to be compliant with local housing codes. Therefore, if there are requirements that are in both the local housing code and the HCRP Notice, the recipient must comply with the more stringent of the two. For ESG funding, only a month-to-month lease is required, however, HUD CoC funds require a one-year lease and Region 16 will default to the strictest funding requirement. These leases must abide by Oho landlord/tenant law, and not include any additional requirements.

Documents required in the Inspection tab of the file include:

* Signed copy of lease
* Completed Lease Review from participant
* Rent Reasonableness worksheet; financial assistance must be made directly to third parties, (such as landlords or utility companies, not to program participants.);

states the level of assistance, due dates, grace period, and late payment penalty and the agreement that the landlord will notify the program when they have to evict a program participant and provide copies of any notice to vacate or any complaint used under state or local law to commence an eviction action against the participant. Case Managers and Fiscal staff must follow the rental assistance agreement. The agreement indicates the duration of assistance and monthly assessment.

* Auditor’s print off confirming property owner
* Refer to CACFC website for current Inspection file.

# Documentation of Rent Reasonableness

Award recipients and sub-recipients must determine, and document rent reasonableness for all units for which HCRP rental assistance and/or security deposit assistance is being provided. The requirement applies rapid re-housing assistance is provided (i.e., when participants are moving into. If the rent for the unit does not meet the rent reasonableness standard, then HCRP funds may not be used to assist the household to be occupied. Further, HCRP funds cannot be used to pay the rent up to the rent reasonable standard, while the tenant pays the remainder of the Rental Agreement.

All program participants must be evaluated for eligibility at least once every month to receive assistance with completed subsidy calculation. Per ESG, the recipient or sub-recipient may make rental assistance payments only to an owner with whom the recipient or sub-recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including any requirements. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or sub-recipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant. *Late payments.* The recipient or sub-recipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as stated in the program participant's lease. The recipient or sub-recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds. Due to this requirement the Rental Agreement must be completed upon program entry and last for 12 months. Case Managers are required to notify the landlord in writing and verbally within 24 hours of a household’s non-compliance with the program. Case Managers must meet with the household at the minimum, every 30 days. Failure to comply results in a breach of the Family Responsibilities document and the household must be exited from the program.

# Documentation of Utility Disconnect/Payment of Utilities for current Rapid Rehousing Participants

*A utility disconnect notice or arrears statement is not sufficient by itself to document program eligibility*. In addition to conducting an assessment to determine that the household has no other financial resources support networks or other housing options, award recipients and sub-recipients must also assess and document that a household with a utility disconnect notice will remain literally homeless but for HCRP assistance. This means that HCRP staff must assess whether the household will be unable to obtain housing if a past due utility requires payment for services to be started (i.e., it will constitute a lease violation causing potential lease termination and/or will cause housing to be unfit for human habitation). HCRP staff will provide a copy of the participant’s lease and highlight the provision related to utility obligations and consequences of non-lease compliance.

# Habitability Standards

All housing assisted under the HCRP must provide safe and sanitary housing that follows the habitability standards outlined in the federal HCRP regulations. These standards apply when a program participant is receiving financial assistance to move into unit. Inspections must be conducted prior to occupancy Note: Housing that is occupied by families with children under the age of 6 and that was constructed before 1978- served with re-housing assistance-must also comply with lead-based paint inspection requirements per the Lead-Based Paint Poisoning Prevention Act (see Lead-Based Paint section below).

The habitability standards are different from the HQS used for other HUD-funded programs. Because the HQS criteria are more stringent than the habitability standards, an award recipient could use either standard. In contrast to HQS Inspections, the habitability standards do not require a certified inspector. As such, HCRP staff could conduct the inspections, using a form such as one available in the HCRP Guidelines manual and on HUD’s website. Organizations providing rental assistance with HCRP funds will be required to conduct initial and any

appropriate follow-up inspections of housing units into which a program participant will be moving. The habitability standards that award recipients must follow are:

* State and local requirements. Each award recipient or sub recipient under this Notice must ensure that housing occupied by a family or individual receiving HCRP assistance follows all applicable state and local housing codes, licensing requirements, and any other requirements in the jurisdiction in which the housing is located regarding the condition of the structure and the operation of the housing or services.

Habitability standards (see page 56 of http://www.hudhre.info/documents/HCRP\_NoticeRedline\_6\_08\_09.pdf).

Except for less stringent variations as are proposed by the award recipient or sub-recipient and approved by HUD, housing occupied by a family or individual receiving HCRP assistance must meet the following minimum requirements:

1. Structure and materials. The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and so as to protect the residents from the elements.

2. Access. The housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.

3. Space and security. Each resident must be afforded adequate space and security for themselves

and their belongings. Each resident must be provided an acceptable place to sleep.

4. Interior air quality. Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.

5. Water supply. The water supply must be free from contamination.

6. Sanitary facilities. Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.

7. Thermal environment. The housing must have adequate heating and/or cooling facilities in proper operating condition.

8. Illumination and electricity. The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient

electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.

9. Food preparation and refuse disposal. All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.

10. Sanitary condition. The housing and any equipment must be maintained in sanitary condition.

11. Fire safety.

i. Each unit must include at least one battery-operated or hard-wired smoke detector, in

proper working condition, on each occupied level of the unit. Smoke detectors must be

located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is

occupied by hearing impaired persons, smoke detectors must have an alarm system

designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired

person.

ii. The public areas of all housing must be equipped with enough, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

# Lead-Based Paint Requirements

HCRP award recipients and sub-recipients must comply with the Lead-Based Paint Poisoning Prevention Act and implementing regulations at 24 CFR 35, as described in the Notice of Allocations, Application Procedures, and Requirements for HCRP award recipients under the ARRA of 2009. The lead-based paint requirement is linked to any form of financial assistance funded by HCRP, and is triggered when financial assistance is offered under either

the Homeless Prevention or Rapid Re-Housing program models.

Lead-based paint assessments must be completed on housing units for families with children six (6) years of age or younger or will move into, units constructed prior to 1978. It is important to note that these lead-based paint inspections must be completed whether or not the family move in to a new rental housing unit. The inspections must be completed prior to the payment of any financial assistance,

which include rental assistance, utilities assistance, utility/security deposits, and rental/utility arrears.

The lead-based paint visual assessment must be conducted by a person that has completed the HUD Certified Visual Assessor training (http://hud.gov/offices/lead/training/visualassessment/h00101.htm). Evidence that staff

successfully completed this training must be maintained in HCRP files for review during site visits. The purpose of the visual assessment is to determine the level of risk of lead-based paint hazards in a unit as compared to national standards that have been deemed to pose little or no risk (de minimis) to cause health concerns. The de minimis standards are further defined in the HCRP guidance entitled “Understanding the Lead-Based Paint Requirements:

Guidance for HCRP Recipients” available at http://www.hudhre.info/documents/HCRP\_LeadPaintGuidance.pdf. It

includes protocols to follow when the visual assessment identifies hazards that exceed the de minimis standards, the treatment of situations when children have known elevated blood lead levels, requirements for ongoing lead-based paint monitoring, and the responsibilities of the landlords/property managers pertaining to disclosure, remediation, and on-going lead-based paint maintenance in assisted units.

Along with conducting inspections, eligible HCRP families must be provided with the HUD lead-based paint disclosure form and a copy of the pamphlet “Protect Your Family from Lead in the Home” by the landlord/property manager. Sub recipient staff must ensure that this documentation is being maintained in the tenant files by the landlord/property manager. HCRP staff indicate compliance with this on the Lead Assessment Form. This is required for all families regardless of a child being in the home.

HUD has developed several templates for use by sub recipients and landlords/property managers to document and manage the lead-based paint assessment process. These documents can be found at http://hudhre.info/HCRP/index.cfm?do=viewHCRPTools. HUD has also posted Frequently Asked Questions which can be found at: [Lead Safe Housing Rule Training - HUD Exchange](https://www.hudexchange.info/trainings/lead-based-paint/lshr/).

# Region 16 Payments Process

Upon enrollment into the program, participants should be given a Landlord Benefits to explain the program. Once an identified unit passes all inspections, the case manager will work with the landlord to complete the Rental Assistance Agreement and W-9. Case Manager will also work with participants to get a copy of the signed lease, the participants signature on Rental Assistance form and a completed ‘Lease Review’ form. All financial assistance that is administered must be tracked on the Direct Assistance Form and in HMIS under Services with the appropriate funding source. Case Managers should be aware of the amount of financial assistance they have available. All financial assistance requested for the participant must have an active lease. There are no exceptions to this rule. It is the responsibility of the Case Manager to verify that the business or property owner name is the same on the following documents: Auditors page, lease, W-9, Rental Agreement, Purchase Orders and Check Requests. Payment must be made to the owner of the property as listed on the W9. To verify ownership, use your local auditor’s website and print off Ownership verification, placing it in the Inspection tab of the participant file. If rental payment needs mailed to a location other than that listed on the W-9, the case manager must make a note at the bottom of the Check Request that reads; DO NOT MAIL. HCRP management will give the check to the Case Manager for delivery to appropriate site.

Documents required in the Financial Assistance tab of the file are:

1. Assistance Tracking Form
2. Budget
3. Purchase Orders
4. Check Requests
5. signed Rental Assistance Agreement
6. Completed W-9

RRH Case Managers must submit their monthly rent requests by the 25th of each month for payments to be made on time in accordance with the lease terms. Please note: Community Action cuts checks on Mondays, so all check requests must be submitted by the 25th to be paid out by the first on the month.

Documents required for this portion of this process is located on the CACFC website under the Financial Assistance tab. NOTE: a copy of the signed lease is required for ALL rental assistance requests. Once all documentation has been provided, HCRP management will submit the information to CACFC’s fiscal department. Payments will be made once they have gone completely through CACFC’s Fiscal Policy and Procedure.

**Maximum number of months:** No family may receive more than 12 months of assistance per program stay. They may not exceed 24 months of HCRP assistance in a lifetime. This applies to the entire state of Ohio.

**Determining monthly subsidy:** Program participants must meet with the Case Manager at enrollment to discuss the amount of subsidy they will receive for move in and the first month. HCRP will provide the least amount possible. To obtain this goal, the region utilizes the Budget Form. The Budget incentivizes the participant to increase income, provides easy uniformity of application by case manager, and allows the case manager to assist the participant in learning to budget over time. Each month, the budget must be calculated again and the rental assistance agreement must be updated and provided to the landlord.

# Case Management and Services

The RRH Case Management and Services core component is comprised of providing individualized case management to RRH participants to help them obtain and move into housing, stabilize in housing, and determine when the RRH assistance can be terminated. Effective case management involves a blend of assessment and coordination services provided throughout the participant’s time in the project and tailored to participant needs as they pertain to retaining permanent housing.

The following section identifies the minimum policies and elements of Region 16 RRH Case Management. All the following must be incorporated into RRH project’s formal Policies and Procedures.

RRH projects engage in all the following case management and services activities:

1. Services to help obtain and move into housing - Assess and understand tenant needs and housing barriers and help resolve barriers. Provide support to RRH participants as they look for housing units and assist in housing search as needed.
2. Services to help stabilize in housing - Help resolve any tenancy issues that may arise; Help participants understand their responsibilities within a lease; Connect participants to mainstream resources and employment.
3. Close out the case - Assess participant need to ensure there is no longer imminent risk of homelessness; Ensure participants know they can contact RRH again if needed; Financial assistance may only be provided if participant becomes homeless again (or if the case has not yet been closed).

# Service Planning – Housing Barriers Assessment

1. Case Managers must seek to understand the housing barriers of their RRH participants and develop plans to address barriers. RRH projects conduct housing barrier assessments in order to understand potential challenges in finding housing for RRH participants. (Housing First Note: Knowledge of housing barriers is never used to screen out potential RRH participants. It is only used to inform identification of housing options and the development of housing plans).
2. RRH staff develops housing plans collaboratively with RRH participants. RRH staff work with participants, using strengths-based approaches, to resolve housing barriers in order to make more housing options available. In collaboration with RRH participants, help identify rental units and contact landlords/property managers on participant’s behalf as needed. Using the project’s housing unit tracking information, review current local housing options and share with participant any potential options.

# Housing Placement

Region 16 RRH staff must continually work on landlord recruitment and actively update the available housing list. The Landlord Benefits Form, available on the homeless crisis response program website, outlines the benefits of working with Community Action programs. Efforts must be made to engage landlords to participate in monthly continuum of care meetings.

The available housing list must include a wide array of housing options. This must include subsidized housing, income based housing and private housing. Referrals should be made to the Metropolitan Housing Authority when household’s income qualify and the list is open.

Region 16 staff may not have a policy of “not advocating” for homeless participants. The amount of assistance must be tailored to the participant’s needs. A poor rental history, past drug use or other housing barriers are not acceptable reasons for not assisting these households with placement services. When needed, staff should practices discussing housing barriers and poor rental histories with the participant so they may advocate for themselves. When the household is not capable of this on their own, due to ability or disability, staff should intensify services to help the participant find housing as rapidly as possible.

**Ongoing Home-Based Case Management Services**

1. Case management, aside from the monthly visit and visits to get and keep an individual housed, must be voluntary.
2. When possible, RRH projects provide case management services in the participant’s home. At a minimum, case management must take home at least once during the program. This allows case managers to see if additional life skills support may be necessary to keep the household in housing.
3. During the monthly visit, which must happen at least monthly, staff and participants must address the following:
4. The need for ongoing financial assistance and the amount to be provided
5. Review monthly income and expenses
6. Update the housing stability plan
7. Verify the household is still living in the unit
8. Housing Stability Planning – A housing stability plan establishes actions and timelines for participants to seek non-cash benefits, cash income, and connection to other mainstream resources, as determined collaboratively by the participant and program staff. This includes figuring out what benefits they desire and developing a plan to get them. These resources include: food pantries and food support programs, health insurance/Medicaid, utility assistance, SSI/SSDI, child care, job training programs, clothing assistance and transportation. Referrals should also connect to community supports that assist with resume development, job search skills, and interviewing skills.

Housing stability plans will also establish actions and timelines for participants to address other housing-related goals/needs, as identified by the participant. This may also include working to resolve tenancy issues, on-time rent payments, following the lease, being a good neighbor, and not causing damages to their units.

RRH Case Managers must make multiple attempts to engage RRH participants who are not making progress on Housing Stability Plans. This is accomplished through the following methods:

* During required RRH Case Management meetings, RRH program staff and participants collaboratively review progress on the Housing Stability Plan and identify any areas of the plan that need revision.
* After revisions to a Housing Stability Plan have been made, RRH program staff allow at least one to two weeks for participants to make progress on the revised plan.
* If RRH participants continue to not make progress on revised Housing Stability Plan, RRH program staff may begin process to exit the participant from the program.

1. Tenancy Issues – RRH Case Managers must respond to tenancy issues and mediate between the landlord and the participant to retain current housing. Case Managers should use discretion and identify when retaining current housing is not an option. In these cases, staff must work with the landlord and the participant to negotiate a move out to avoid eviction.

### Case Closeout and Termination of Assistance

Successful RRH case closeout involves ending rental assistance and services after RRH staff have determined that the participant is no longer at imminent risk of homelessness, as evidenced by some connection to mainstream resources, employment, and/or other supports. Planning for case closeout should begin within 30 days of program entry so that staff and participants have sufficient time to prepare closeout and to ensure the eventuality of case closeout is clearly communicated to participants from the very beginning.

**Positive Exits**RRH staff may close out the case at any time if the household is no longer at risk of homelessness and/or when the household indicates they are no longer in need of RRH services. Determining whether or not a household is still at imminent risk is a multi-step process. Case Managers should consider the following:

* Progress on Housing Stability Plan
* RRH participant has gained or increased employment or cash income
* RRH participant has gained or increased non-cash benefits or other mainstream resources
* RRH participant has gained or accessed other supports, such as connecting with family support systems, for example
* Ratio of income to rent/living costs
* Housing in good standing (participant can pay rent and follow lease conditions)

**Non-Responsive Exits**

There may be times when a participant is nonresponsive, and it is necessary to exit them from the program. Program staff must make every effort to re-engage the participant, even if it is just to exit them from the program. Reasons a participant may become non-responsive could include incarceration, going to treatment, their work schedule, personal problems, being unable to pay their phone bill, or a problem with the program or the rules.

Staff must follow the termination policy and this protocol before exiting a nonresponsive participant:

* Make at least three attempts to contact the participant by phone, mail, email, and/or home visit. You must use three different methods.
* Where there is a release, contact other organizations working with the participant to see if they have information about the participant’s whereabouts (only if appropriate and necessary).
* The very last effort prior to exiting a participant (and when there is a release in place) would be to contact the landlord. This should be done with care and Case Managers must be careful to follow our confidentiality policy. This should only happen when the next effort will be closing out the case.

○ Where there is a release, contact the landlord to see if they have information about participant whereabouts

If there is no contact for 30 days of multiple varied methods of attempts to reach the participant, RRH staff exit the participant from the program. Staff must send written communication of program termination to the participant explaining the reason for and date of termination. The date of termination must be 33 days after the date of the termination letter. (The letter must be mailed the date it was written, or termination should account for the time it spent not in transit). Case Managers should send a letter to the landlord the same day with communication of the likely program termination and termination of financial assistance.

If the household contacts the RRH Case Manager project after the termination date and are still experiencing homelessness, RRH staff connects them with the county access point so they can begin the Diversion process. Future RRH assistance is not denied based upon participant’s non-compliance in prior RRH enrollment.

**Negative Exits (Termination of Assistance)**

Case Managers may terminate assistance for serious violations of program requirements. For example, a program participant has been arrested multiple times for selling drugs out of their unit. Staff discussed the fact that the participation agreement does not allow for criminal behavior and the participant continues to sell drugs out of their unit. Another example might be that the individual has physically harmed a staff person or another program participant.   
  
Individuals cannot be terminated for any of the following: failure to participate in supportive services (beyond a monthly visit), failure to make progress on the service plan, loss of income or failure to improve income, or being a victim of domestic violence. All projects must seek to avoid negative terminations whenever possible and, where they do occur, they do not prohibit an individual or family from accessing assistance in the future. Prior to terminating a participant, staff must talk with their program director.

All customers must have access to this policy by either providing the policy upon program enrollment or posting the policy in a public location. Homeless assistance programs are last chance programs and agency staff should show a documented history of severe infractions to justify program terminations and the use of program terminations should be a rare occurrence.

Region 16 Approval/Denial PolicyDenial of assistance may include: individual or household ineligibility, failure to provide verifiable evidence of eligibility, or fraudulent representation of the applicant’s documentation or information provided during the referral and assessment process. Applicants’ eligibility determination is provided through the access point’s completion of Coordinated Entry tab and referral through HMIS. Staff will contact referred applicant and coordinate an assessment for RRH. If staff deems applicant is ineligible for the program, staff will inform the applicant in writing the reasons for the ineligibility determination and provide information regarding how the applicant may file a grievance. If the customer does not agree with the decision, they may utilize the Region 16 Grievance Packet for a remedy of the situation. All applicants must have access to this policy by either providing the policy upon program enrollment or posting the policy in a public location. Applicants must receive an approval or denial within 20 business days from their application to the program.

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### Region 16 Grievance Policy

SCOPE AND PURPOSE: Region 16 will provide potential, current, or former housing participants an opportunity to address any concerns and/or decisions made by Region 16 housing staff in relation to their individual case or general operations. This Grievance Policy must be posted or given to potential, current, or former housing participants.

RESPONSIBILITIES:

Agency Administration and Staff shall:

* Region 16 will make available to housing participants, potential housing participants, and other

interested parties the Grievance Packet (includes the Grievance Policy, Complaint form and Appeal

form).

* It is the intent of Region 16 Housing Staff that participants be treated at all times with respect and their

current housing circumstances will be kept in the strictest confidence.

* A copy of this policy will be clearly posted in appropriate agency offices.
* All housing participants will be informed of their rights at program enrollment.
* Housing Participants are provided a full explanation of their participant’s rights policy and a copy will be

provided upon enrollment.

* Staff will receive orientation regarding the agency’s policy on participant’s rights and grievance

procedures.

* If the complaint is the result of a participant being EXITED, a 48-hour extension may be granted while

the Region 16 Housing Director decides, unless the reason for program exit was a safety violation

(violence, abusive behavior, illegal drug use on premises, etc.).

* Each housing participant will have the opportunity to express his/her feelings concerning their

dissatisfaction with the Policies and Procedures of the agency in an appropriate manner.

There are three (3) steps to the Grievance Process:

1. Discuss the matter with the housing staff member involved. An open discussion will usually clear up the misunderstanding and solve the problem. If the matter remains unresolved, move on to step 2.

**2.**  Request a grievance form, complete it, and forward completed form to: Homeless Director Stacey Johnson. If participant is unable to fill out the grievance form, they may request an in-person meeting with the appropriate Program Director (PD). PD will document and review the grievance, then respond in writing to the participant within five (5) working days of receipt of the complaint. If the participant remains dissatisfied with the resolution offered, s/he may take the next step. \*\* or in the case that the grievance is with the Peace House DV Director, the completed grievance form should be forwarded to the Homeless Director for review. If grievance is with Homeless Director, the grievance form should be forwarded to the Executive Director.

**3.** Participant may **r**equest that their complaint form be forwarded to the Executive Director for review. S/he will take one of the following two (2) steps:

* + - * Give the participant a written response which would indicate the final disposition or;
      * Call a conference for the parties involved in the incident(s). The final disposition will be issued within five (5) working days of the conference and will update the appropriate housing staff.

If the final decision is not satisfactory to you, you may file a request for an administrative appeal. Submit a completed written appeal, along with the response of the agency to: Patrick Hart at 77 S. High Street, P.O. Box 1001 Columbus, OH 43216.

# Domestic Violence Policy & Procedure

The CACFC recognizes the importance of connecting domestic violence survivors with the necessary interventions, supports, and educational resources to stabilize them during and following an incident of homelessness. Domestic violence survivors often face significant barriers to housing, developing support networks, and employment/income maintenance. Through community planning, policy, and process the CACFC will reduce the barriers homeless domestic violence survivors and their dependents face while accessing services and increase their ability to escape the cycle of violence and poverty. It is because of these barriers we have established the following policies and procedures. Please note that these policies also protect victims of sexual assault, dating violence, and stalking.

The CACFC is concerned about the safety of participants in homeless assistance programs, and such concern extends to participants who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking. As stated by HUD, CoCs should be able to provide individuals and families fleeing violence access to housing and trauma-informed, victim-centered services that prioritize the survivor’s safety needs, accommodates their unique circumstances, and maximizes participant choice.

*Philosophy*The survivor knows best. Advocates should recognize that the survivor is the expert on their own situation, knows the abuser better than anyone, and is already doing safety planning on a regular basis as part of their survival, though they may not label it as such. Simply accessing services has required safety planning. CACFC housing programs utilize empowerment methods and begin by asking what they have already done to stay safe and validating their efforts. The survivor should take the lead in developing their housing plan; our job is to facilitate the process and offer information. Each situation is different, and different things work for different people. Be flexible in how you plan with survivors to accommodate a range of differences. Recognize the impact that cultural background, experiences, trauma, and/or values may play.

*Objectives*• Survivors escaping domestic abuse can access a range of housing, financial assistance, and case management services;  
• Survivors receive consistent and comprehensive services;  
• Survivors are able to make an informed choice about the choices available to them to enable a safe and sustainable solution to their housing stability.

*Scope*

This protocol will apply to all survivors of domestic violence accessing emergency shelter, rapid re-housing, or permanent supportive housing.

*Domestic Violence Screening*

The question to be asked for every person accessing housing services should be asked as follows: Have you ever been pushed, kicked, hit, or otherwise hurt by an intimate partner or family member? If the question is answered affirmatively, the next questions are:

Can you tell me a little more about the situation?

When did this/these occur? Domestic Violence shelters receiving VAWA funds do not use HMIS and homeless programs must record these individuals as anonymous participants.

The CACFC has a domestic violence addendum form. This form is available on the internal homeless programs page. These should be added to the file as appropriate, as this form contains information that will aid in participant safety. Visit <https://www.cacfayettecounty.org/internalhomeless/>

*Assessment*The assessment process for the programs is designed to be minimally intrusive and focuses primarily on rental history, income, and other potential barriers to housing. The Coordinated Intake Documents should be mailed or hand delivered. Faxing or email such information could pose a threat the safety of the survivor and their children.

*Services*  
CACFC provides an array of services to the households in its homeless/prevention programs, including, case management, financial assistance, and landlord mediation. All the services provided by CACFC are “participant-driven.” This service philosophy is driven by the premise that, given choices and opportunities, participants will work to ensure their own safety and success. CACFC believes that, if services are meaningful to participants’ goals, they will actively remain engaged in services. Services begin with the first contact with homeless program in the form of a crisis intervention addressing the immediate pressing needs of the household. This includes ensuring household safety and a possible placement in permanent housing.

A housing search begins immediately. Short-term goals are developed, and CACFC provides direct financial assistance and advocacy with landlords to help households access housing. Financial assistance can range from short-term rental assistance to assistance with accessing permanent housing subsidies. CACFC has built strong relationships with area apartment management companies and landlords. Because CACFC is there to support its participants, the landlords are more likely to rent to the participants, even when they have spotty rental histories or yet insecure income.

Once housing is obtained, a case manager begins to work with the household on issues that will promote housing retention. Services offered during this phase include home visits, job search and job training referrals, case coordination with other systems, linkages to legal services, and help with budgeting and goal planning. Eventually, work begins on long-term goals, including increasing household income and helping survivors navigate public and community-based services independently. CACFC has worked with mainstream and community-based social service providers to make it easier for its participants to access assistance. The relationship with mainstream providers also helps facilitate referrals of households in crisis to CACFC services. Financial subsidy is commonly provided for 3 months to 12 months, but other supportive services offered to families may last permanently if participant qualifies. All of the aforementioned services should be offered but cannot be required.

## **Domestic Violence during the Program – Emergency Transfers**

In accordance with the Violence Against Women Act (VAWA), CACFC homeless programs providing housing or rental assistance must allow participants who are victims of domestic violence, dating violence, sexual violence, human trafficking, or stalking to request an emergency transfer from the participant’s current unit to another unit.

The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of HP to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether CACFC has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that the CACFC is in compliance with VAWA.

**Eligibility for Emergency Transfers**

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD’s regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

**Emergency Transfer Request Documentation**

To request an emergency transfer, the tenant shall notify their case manager and submit a written request for a transfer to 1400 US Route 22 NW, Washington Court House, Ohio 43160. CACFC will provide reasonable accommodations to this policy for individuals with disabilities. The tenant’s written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under CACFC’s program; OR

2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant’s request for an emergency transfer.

CACFC may request documentation of the domestic or sexual violence. If requested, the participant may provide any one of the following forms of documentation: 1. HUD model form located on the homeless crisis response program page 2. Signed documentation from a victim service provider, an attorney, a medical professional, or a mental health professional from whom the participant has sought assistance relating to domestic violence, dating violence, sexual violence, or stalking, or the effects of abuse; or 3. A police report or court record.

If a housing provider receives reports or documentation of domestic or sexual violence that contain conflicting information (including certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator), the housing provider may require a participant to submit third-party documentation, as described in 2 & 3 above and in 24 C.F.R. 5.2007(b), within 30 calendar days of the date of the request for the third-party documentation. If third party documentation is not received or third party documentation presents conflicting information, the housing provider must contact the City’s Office of Domestic Violence Strategies for case consultation.

**Confidentiality**

CACFC will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives CACFC written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about CACFC’s responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

**Emergency Transfer Timing and Availability**

CACFC cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. CACFC will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. CACFC may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If CACFC has no safe and available units for which a tenant who needs an emergency is eligible, CACFC will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant’s request, CACFC will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan. CACFC staff should connect victims to the Ohio Domestic Violence Network at 1-800-934-9840. ODVN, when funding is available, has up to $1,200 in relocation assistance funding that can be tapped if CACFC resources cannot feasibly cover the costs. This program also pays for moving expenses or utilities that CAC programs may not have the funding to cover.

**Safety and Security of Tenants**

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network’s National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at https://ohl.rainn.org/online/.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime’s Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding human trafficking, you may visit the National Human Trafficking Hotline website at https://humantraffickinghotline.org/ or contact the National Human Trafficking Hotline–available 24 hours a day, 7 days a week, in more than 200 languages–by calling 1-8883737-888 or texting HELP to BEFREE (233722). Callers can dial 711 to access the Hotline using TTY. Additional options include live chat at https://humantraffickinghotline.org/chat or email to help@humantraffickinghotline.org.

**Non-transferring Household Member(s) & Lease Bifurcation**   
If a family separates in order to affect an emergency transfer and the non-transferring household member is engaged in criminal activity directly relating to domestic violence, sexual violence, dating violence, human trafficking, or stalking, the housing provider may bifurcate the lease, or remove said household member from the lease in order to evict, remove, terminate occupancy rights, or terminate assistance to the non-transferring member. In terminating assistance or occupancy rights of the non-transferring household member, the housing provider must follow its written termination policy and grievance procedure, including formal due process. In removing the abuser or perpetrator from the unit, the housing provider must follow Federal, State, and local eviction procedures.

When a household receiving assistance separates, the household’s assistance shall continue for the household member(s) who are not evicted or removed in a program for which the remaining household member(s) are eligible.

**Perpetrator in the Home**

If the abuser returns to the home at the request of the survivor, home visitors may choose to conduct off-site home visits. Participants will not be judged for their decision to return to the abuser. Case Managers must understand the dynamics of abuse.

**Suspicions of Violence**

If it is suspected that violence is taking place in the home, the case manager should educate the survivor when they are alone of resources in the community to assist victims of domestic violence and conduct safety planning. Case Managers should remain non-judgmental and empower the survivor.

**Prior Domestic Violence Charges**

Prior domestic violence charges do not bar a household from entering housing programs. CACFC believes all individuals have the right to access housing. Facility-based CACFC programs may place violent offenders at alternative shelter for safety reasons. The emergency shelter is the county’s domestic violence shelter. However, housing first requires that no one be denied homeless assistance due to criminal history unless there is a clear and imminent threat to staff or program participant safety. The emergency shelter should utilize flexible funding sources to place these individuals at hotel/motel or, if they will accept services, at a singles shelter in a neighboring county.

Homeless Youth Policy

Purpose  
The CACFC recognizes the importance of connecting homeless youth with the necessary interventions, supports, and educational resources to stabilize them during and following an incident of homelessness. Homeless youth often face significant barriers to education due to housing stability. Through community planning, policy, and coordinated entry process the SCOR will reduce the barriers homeless children face in education and therefore their ability to escape the cycle of poverty. Homeless children often are unable to meet enrollment requirements, miss more school, lack educational continuity, and face the additional burdens that poverty imposes upon their ability to assimilate, find stability, and thrive in the educational environment. It is because of these barriers we have established the following policies and procedures for all emergency shelter, rapid re-housing, and permanent supportive housing programs.

Program Intake:  
A county assigned access point will conduct the coordinated entry assessment and referral to the appropriate project.

Parents with school aged children will be informed of their rights under McKinney-Vento upon entry into the program. Under McKinney-Vento homeless youth, defined as “children and youth who lack a fixed, regular, and adequate nighttime residence, including children and youth living in programs, transitional housing, cars, campgrounds, motels, and sharing the housing of others temporarily due to loss of housing, economic hardship, or similar reasons” have the following rights:

* Students who are homeless can remain in their school of origin, even if their temporary living situation is in another school district or attendance area, if that is in their best interest. Schools must provide transportation.
* Children and youth who are homeless can enroll in school and begin attending immediately, even if they cannot produce normally required documents, such as birth certificates, proof of guardianship, immunization records, or proof of residency.
* Every school district must designate a homeless liaison to ensure the McKinney-Vento Act is implemented in the district. Homeless liaisons have many critical responsibilities, including identification, enrollment, and collaboration with community agencies.

Program staff will then provide the telephone numbers to the schools and transportation facilities available for their school of origin. When the parent and/or youth do not feel the school of origin to be an appropriate choice or in their best interest, families and youth will be referred to the school district of their choice.

Program staff will ensure that parents call the school and transportation within 48 hours of program entry. If the parent does not call the school program staff will call on their behalf.

Program staff will refer children from birth to preschool ages to Help Me Grow, Early Head Start, and/or Head Start as appropriate. Homeless children are given a preference for those programs.

Within 48 hours of entry into the program staff will ensure that residents report their change of address to Ohio Department of Job and Family Services.

Parents will also be provided a community resources guide that provides referrals to the following agencies: local food banks, community meals, faith-based organizations that provide necessary items, school supply drives, and the nutrition and parenting classes offered onsite at the program. All children will be referred to the local library to obtain a library card.

As appropriate, parents will be referred to: Board of DD, CLUSTER, Scioto Paint Valley Mental Health, and volunteers who tutor children having troubles with their schoolwork.

School aged children’s bath and bedtimes will be scheduled to be consistent with the necessary sleep and preparation to have a productive, healthy school day while living in congregate facilities.

The program point of contact will email or phone the appropriate school liaison to inform of the child’s homeless status.

Collaboration:

The CACFC provides the leadership for the Regional Continuum of Care. In that capacity, it is the duty of the CACFC to collaborate among local boards to raise awareness of services and supports for homeless children and youth. A representative from CACFC will serve on the Continuum of Care, Family & Children First Council and the Victim Response Team. The Continuum of Care Coordinators will also coordinate with the local schools during the point in time counts to identify homeless children and provide parents with information regarding their rights under McKinney-Vento.

**Homeless Liaisons by County:**

This list is maintained on the Ohio Department of Education webpage at <http://education.ohio.gov/Topics/District-and-School-Continuous-Improvement/Federal-Programs/Elementary-and-Secondary-Education-Act/Programs-Administered-Under-ESEA/McKinney-Vento-Resources-for-Awareness>. Should this webpage close, staff may search; homeless liaison-Ohio to find the updated page. This happens periodically when there is a change in leadership at the state level.

The most recently downloaded and sorted form locally can be found on the CACFC website @ [https://www.cacfayettecounty.org/region-16-homeless-housing-programs/](file:///C:\Users\CACFC-DB\AppData\Roaming\Downloads\School-Homeless-Liaison-Contact-Information%20(1).xlsx)under the heading Community Resources for the homeless and at-risk, titled School Homeless Liaison Contact Information.

**Designated Staff for Homeless Youth Policy**

Clinton County – Amber Taylor (Clinton County Homeless Shelter)

Fayette County – Stacey Johnson (Community Action)

Highland County – Greg Hawkins (Highland County Homeless Shelter),   
  
Pickaway County – Elizabeth Trainer (Community Action), Rachel Dye (Haven House)

Ross County – Skyla Eblin (Community Action)

# Transition Aged Youth Policy

The CACFC has identified the following values to guide the development of this transition-aged youth policy, hereafter referred to as TAY.

* Youth homelessness is unacceptable. All young people deserve a safe place to grow and thrive.
* Youth homelessness is solvable
* Youth homelessness is about more than the loss of housing; it’s about the loss of critical connections to family, community, school, and employment.
* Youth choice should be at the forefront of all program design.
* Youth will be served within their own community, if they so choose.
* Effective, youth-dedicated programs recognize, respect and accommodate youth at all stages of development.
* Youth homelessness disproportionately affects LGBTQ populations. Youth services must be culturally competent.

Given the special needs of the TAY population, certain measures will be taken to account for these needs. Staff will either place TAY in PSH or RRH, depending on their TAY-VI-SPDAT.

Outreach – Outreach should take place at the following: Children’s Services, ODJFS’s Bridges Programs, Juvenile Probation, High Schools and Vocational Schools, local colleges, Youth Recreational Centers/Programs, parks, libraries, Help Me Grow, Head Start, and Faith based Organizations.

Bridges Offices:

Central Office - c.region@cfhcohio.org (614) 655-8259 – Fayette, Pickaway and Ross Counties

Southwest Region - sw.region@cfhcohio.org (614) 568-6596 – Clinton and Highland

For information on the statewide program for youth aging out of foster care, visit: <http://bridgestosuccess.jfs.ohio.gov/about/about-bridges/>.

**Assessment** – TAY should complete the TAY-VI-SPDAT. This assessment had language and scoring modified to reflect the differences in this population.

**Case Management/Services** – Case Management and services are more intensive and program stays are longer for TAY. Youth will need additional life skills training and staff must be prepared to assess and teach youth these skills. This may include: budgeting, credit repair, managing utilities, house cleaning, hygiene, finding and keeping a job and accessing mainstream resources. Case Managers, when it is safe to do so, should work to reunify youth with their families.

To access a youth life skills assessment, visit <https://caseylifeskills.secure.force.com/clsa_homepage>. You can conduct the assessment at entry and at selected follow up intervals. Completing this online will result in an online strengths-based plan that you and the youth can work on together. Assessment data is retained for two years.

Youth have a tendency to be more fluid and transient in living situation. The program should be open to shared housing situations and allowing individuals to move in mid-lease.

**Financial Assistance** – Staff should expect to spend more time/week per participant. While staff should use the same policies and procedures by tailoring financial assistance to individual needs, they can expect youth to take more assistance on average.

**Training** – Working with youth requires the use of the Positive Youth Development Framework. Program staff should familiarize themselves with this best practice and consider how they may engage with youth. Without meaning to, we may often make decisions for youth without engaging them or assume they do not have the ability to make sound decisions.

Trainings on YEP:

<http://actforyouth.net/youth_development/professionals/manual.cfm>

<https://www.hudexchange.info/resource/5138/ending-youth-homelessness-a-guidebook-series/?utm_source=Youth.gov&utm_campaign=Reports-and-Resources&utm_medium=federal-links>

<https://rhyclearinghouse.acf.hhs.gov/sites/default/files/docs/16952-2008_Positive_Youth_Development.pdf>

Outreach  
General Outreach  
Outreach will take place monthly through regular services and media channels, and the summer and winter Point-in-Time (PIT) Counts.

Regular service activities include conducting outreach for participants through participation at the Continuum of Care, Family and Children First Council, and the Ministerial Association meetings. Service outreach will also include meeting with front line staff at various social service agencies and explaining the eligibility criteria for the program. The Continuum of Care regularly engages with local law enforcement to make them aware of available services and law enforcement regularly contacts the CoC when they meet homeless individuals. Additionally, staff works with local landlords and will utilize this as a channel to conduct outreach to individuals being evicted from housing. Regular media channels include social media, the local radio stations, the local newspapers, and the local news channels. Special outreach must also be conducted. RRH Case Managers shall be culturally competent in their efforts to bring eligible individuals into the program. This may mean reaching out to special interest groups or placing marketing materials where special populations can be found.

Outreach at the Point-in-Time(PIT) Count will include a PIT Drop In site. The PIT Drop In site will offer: representatives from local service agencies including Job and Family Services, the Homeless Shelter, staff from CAC homeless department, and counselors from Mental Health Clinics, as available. Information available will include brochures on 2-1-1, local food pantries, housing providers, and landlord lists. Along with the social service supports, applications, a soup kitchen, clothing, blankets, and haircuts will also be provided. Press releases regarding the PIT count will be placed with local media and flyers will be distributed at targeted locations throughout the county.

Regular service and media outreach will encourage individuals to report individuals and families sleeping on the streets to the RRH Case Manager.

## Street Outreach

HCRP Providers will actively work with local agencies to verify reports of individuals and families living in places not meant for human habitation.

Flyers will be placed quarterly at laundry mats, grocery stores, local food pantries, social service agencies, the police department, the sheriff's department, elderly and disabled properties, disabled programs, and other locations to announce the availability of assistance.

Case Managers will lead annual street counts to locate individuals living on the streets. Targeted locations include: woods, abandoned buildings, parking lots, truck stops, ­­­­­­­­­­­­­­­etc.

Landlord OutreachLandlord Outreach will take place annually on the local Continuum of Care level. Local housing providers and private landlords should be invited to a Continuum of Care meeting. Once annually, the meeting should feature a brief presentation on each program available in the community as well as information on Fair Housing. Landlord Outreach serves as the foundation for securing stable housing for our most vulnerable participants.

# Record Retention Policy

CACFC staff must comply with the agency’s record retention policy and this homeless program retention policy. The fiscal policy outlines agency-wide processes such as audits, personnel files, agency board minutes, tax documents, payments, leases, etc. This policy dives more deeply into homeless program requirements and references homeless program efforts. Homeless program information is marked with an asterisk. (\*)

Homeless program-specific information shall be maintained based on the following:

**Permanently**Audit reports  
Board minutes, by-laws, organizational chart, articles of incorporation  
Continuum of Care minutes and regional continuum of care minutes\*  
Charts of accounts  
Checks for important purchases/payments  
Correspondence – legal and important matters  
Deeds, mortgages  
Depreciation schedules  
Insurance records, current accident reports, claims, policies, ext. (current and expired)  
Journals  
Patents, copyrights, trademark registrations, and related documents  
Point in Time count records (volunteer hours, HMIS reports, unsheltered data forms, etc) \*  
Program policies\*  
Property analysis by outside appraisers  
Property records: costs, year-end trial balances, depreciation schedules, blueprints/plans  
Retirement/pension records

Staff training and certifications \*  
Tax returns and worksheets  
Training manuals  
Year-end financial statements

**Seven Years:**Accident reports/claims – settled cases  
Accounts payable/accounts receivable ledgers and schedules  
Bank Statements and Reconciliations  
Cash Receipt & invoices  
Checks – cancelled with exceptions listed  
Contracts, mortgages, notes, leases – expired  
Expense analysis/expense distribution schedules  
Garnishments  
Inventories  
Invoices – to customers, from vendors  
Memoranda of Understanding (HCRP and PSH projects)\*  
Notes receivable ledgers and schedules  
Payable & receivable ledgers  
Payroll records and summaries  
Personnel files –terminated employees  
Purchase orders: from purchasing department  
Subsidiary ledgers  
Timesheets  
Vouchers: payments to vendors, employees, etc.  
Withholding tax statements

**Four years:**  
Homeless Programs Participant Files\*  
HUD CoC APR and backup documentation\*  
ODSA Reports and backup documentation (every 6 months)\*

**Three years:**  
Employment applications  
Federal grant documents (following the submission of the final report)  
Insurance policies – expired  
Internal audit reports  
Petty cash vouchers  
Records for specific grants and participant files, unless otherwise stated by the funder

**Two years:**   
Bank reconciliations  
Correspondence – general, with customers/vendors  
Deposit slips

**One year:**

Purchase orders – non-purchasing department

In cases where unresolved audit questions arise, CACFC will retain all records relevant to the audit questions for the time fr4ame necessary for resolution of the question.

**Record Destruction**

After the seven-year retention time has expired a shredding company is contacted to come onsite to perform the record destruction. All programs are notified of the upcoming visit to have adequate time for preparation.

**Guidance on HCRP Reporting for Victim Service Providers**

HUD has determined that HCRP award recipients/sub-recipients that are victim service providers as defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA) should NOT enter data directly in HMIS and must use a “comparable database.” VAWA defines a victim service provider as a nonprofit or nongovernmental organization including rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

Minimal Standards for a “Comparable Database”

Victim service providers that receive HCRP funding must submit unduplicated aggregate reports about the individuals and families served with HCRP funds to the HCRP award recipient

on a quarterly basis or, if required by the award recipient, on a more frequent basis. HCRP-funded providers must also have a mechanism to track the length of assistance provided to program beneficiaries to ensure that participants are recertified every 3 months if

receiving medium-term rental assistance and that participants do not receive more than 18 months of HCRP assistance. Therefore, a victim service provider’s comparable database must collect participant-level data over time and generate unduplicated aggregate reports based on that data. It cannot be a database that only records aggregate information.

The comparable database must comply with all current HUD HMIS Data and Technical standards. As of June 2009, current applicable HMIS Data and Technical Standards include Section 1 (Introduction), Section 4 (privacy and security standards), and Section 5 (technical standards) from the 2004 HMIS Data and Technical Standards Final Notice (69 FR 146, July 30, 2004) and Section 2 (program descriptor data elements), Section 3 (universal

data elements) and Section 4 (program specific data elements) of the 2009 HMIS Data Standards. The HMIS standards also require organizations to comply with any federal, state, and local laws that require additional confidentiality protections, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (45 CFR Parts 160 and 164), the Confidentiality of Alcohol and Drug Abuse Patient Records Rule (42 C.F.R. Part 2), and VAWA.

Minimum Data Collection Requirements for Victim Service Providers

Victim service providers are required to collect and record all data elements that are required for HCRP funded providers on all participants served with HCRP funds in a comparable database. The participant-level data collection requirements for HCRP are specified in the 2009 Data Standards Notice. They include: all universal data elements, and a subset of the program-specific data elements.

In addition, all of the program descriptor data elements must be recorded about each HCRP in the HMIS (either by the HCRP-funded provider or by the HMIS system administrator) and the fields needed to correctly generate the HCRP performance reports are required to be collected in the comparable database. A mailing address (e.g., P.O. Box) or administrative office address are acceptable in lieu of a shelter’s physical address. The program descriptor data elements only need to be entered once for each program and are not repeated for each participant; however, each HCRP participant record will need to include the appropriate Program Identifier in order to correctly generate required reports. The required data elements are summarized in the 2009 Data Standards, Exhibits 1-1, 1-2 and 1-3, available at http://www.hudhre.info/documents/HCRPVictimServiceReportingGuidance.pdf.

Suppression of Potentially Identifying Data in HCRP Annual Performance Report (APR)

Victim service providers may suppress aggregate data on specific participant characteristics in the HCRP APR when the following two conditions are met:

1. The aggregate number of persons reported for a particular reporting field is less than either one percent of the total number of participants or five persons, whichever is greater, and

2. Provider staff reasonably believes that the inclusion of such information may constitute a threat to a participant by allowing a victim’s stalker or abuser to identify the location of a participant with an uncommon demographic profile.

For example, a victim service provider that serves only one Asian participant in a jurisdiction with a small Asian subpopulation may report that participant as having an unknown or unreported race.

# Equal Access

CACFC homeless projects serving families must ensure they comply with the Equal Access Rule, as outlined by HUD. The Equal Access Rule outlines the federal definition of ‘family’ for purposes of receiving assistance from certain programs. For CACFC homeless projects, the definition of ‘family’ is as follows: *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.*

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are a family and must be served together as such. CACFC homeless projects cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member’s family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. More specifically, all CACFC homeless projects with dedicated family beds/units must serve families, regardless of the marital status or sexual orientation of the adults.

There are some very limited exceptions to this rule, however, for those programs funded through special initiatives under the annual CoC Competition. For example, the Shelter Plus Care grant funded in the 2013 competition only serves singles because of the limited requirement based upon the funding application.

Keeping Families Intact   
CACFC emergency shelter projects serving families are required to serve the intact family, where desired by the participant. Family members, regardless of age, gender, or other factors, cannot be separated from other family members during their program stay.

**Serving Transgender Persons in Emergency Shelters and Other Sex-Segregated Facilities** CACFC emergency shelters must make their resources available to individuals and families without regard to actual or perceived sex, sexual orientation, or gender identity. Although emergency shelters with shared sleeping areas or bathrooms are permitted to inquire about sex or gender identity for purposes of determining room assignment, best practices suggest that where there is uncertainty about sex or gender identity shelter providers should ask where individuals feel most comfortable sleeping. This may mean that the person should be provided with a private changing, shower, and/or sleeping space, or stagger use of facilities so that the person may shower and change alone. Decisions about how and where someone is housed should be made on a case by-case basis strongly taking into account the person’s preference about where to sleep, and keeping safety a priority.

In situations where providers are unsure of a person’s sex or gender identity, providers may not ask for documentation of sex or gender. The best way to proceed if a provider is unsure is to tell a participant that the agency provides shelter according to the gender with which the participant identifies. Do not ask, “What is your sex/gender?” Do say, “This is a shelter for women, if you would rather be in a different shelter, let us help you find one where you feel safe and comfortable.” It is understood that not every facility can accommodate every gender expression. The spirit of this guidance is about helping people to feel safe and comfortable in their temporary accommodations. This may mean telling a participant what the local options are, without asking about their gender, and doing the most possible 7 to get that person to a place they want to be. Gender-based violence can be inflicted on transgender people and providers are obligated to protect transgender people from such violence the same way they protect women, for example, from violence.

CACFC emergency shelters and other homeless program providers should review the HUD notice, Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities, in order gain a comprehensive understanding of how the notice affects both participants and providers, and guides protocols, policies, and procedures. The notice can be found at https://www.hudexchange.info/resource/4428/notice-cpd-15- 02-appropriate-placement-for-transgender-persons-in-single-sex-emergency-shelters-and-other-facilities.

# HMIS Requirements

‘Service Point’ is the software used by all Ohio Balance of State COCs as the state of Ohio’s statewide Homeless Management Information System (HMIS). OHCP is the designated HMIS lead agency. All assistance provided under HCRP funding must be recorded in HMIS.

As a state, OHCP is required to pass through all non-administrative HCRP funds. Since OHCP is the balance of state HMIS administrator, licenses and associated service agreements for Service Point must be purchased by OHCP. Therefore, OHCP will use other funds for these costs. As such, only Balance of State communities may request HMIS licenses (which include costs for corresponding service agreements). If requesting such, these costs should not appear in the budget since they will not be paid with HCRP funds. Projects located in Cuyahoga,

Franklin, Hamilton, Lucas, Mahoning, Montgomery, Summit and Stark Counties need to cover license/service agreement costs with other funds.

All HCRP recipients must be entered into HMIS with name, date of birth, social security number, and the complete HUD/Ohio Universal Data elements. Because of state and federal reporting requirements, all data for a service or services must be entered into HMIS completely and accurately in the week the service(s) is provided.

Depending on the type of service provided, other data may be required. All Balance of State sub-recipients receiving funding under HCRP will receive Service Point licenses necessary to record these services. Balance of State Service Point users will receive training in the use of Service Point by COHHIO staff and be bound by and follow the same confidentiality and other policies and procedures outlined in Ohio’s HMIS Policies and Procedures Manual, available at http://www.development.ohio.gov/community/ohcp/hmisForms.htm. Specific service related data entry training will be provided to all providers needing to record HCRP-related data. Because of state and federal reporting requirements, all data for a service or services must be entered into HMIS completely and accurately within 5 days service is provided

Award recipients and sub-recipients will be required to meet the following minimum standards for HMIS/HCRP data collection and reporting;

* enter into a HMIS/HCRP Agency Participation Agreement;
* access to a computer with a high speed Internet connection; and
* must ensure that those same staff members have a unique assigned email address that can be accessed regularly during work hours.

To promote coordination of benefits and necessary monitoring of HCRP requirements regarding eligibility and duration of benefits, appropriate interagency agreements will be in place and participant releases of information will be obtained so that HMIS data may be appropriately shared among HCRP sub-recipients. This data may also be shared with other providers using HMIS, given appropriate agreements and the participant’s permission, to promote coordinated planning and service delivery.

# Affirmatively Furthering Fair Housing & Special Population Outreach

Under Section 808(e)(5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD and OHCP require the same of award recipients and sub-recipients. Agencies will have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, gender identify, sexual orientation, disability, and familial status. Examples of affirmatively furthering fair housing include (1) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (2) making buildings and communications that facilitate application and service delivery accessible to persons with disabilities; (3) providing fair housing counseling service or referrals to fair housing agencies; (4) informing participants how to file a housing discrimination complaint, including providing the toll-free number for the local Fair Housing Office; and (5) recruiting landlords and service providers in areas that expand housing choice to program participants.

Program staff must make ongoing efforts to conduct special outreach to these population using the following tactics.

* Placing program materials through mass media sources like radio, television, and the local paper.
* Placing program flyers at local laundry mats, elderly and disabled properties, grocery stores, the library and other locations.
* Distributing information to the ministerial association and to local pastors.
* Conducting specific outreach to other areas that these special populations may congregate or attend.

# Drug-Free Workplace Requirements

The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD’s implementing regulations at 24 CFR Part 21 apply to HCRP.

# Region 16 Sub grantee Monitoring

The Community Action Commission of Fayette County is responsible for ensuring that the HCRP requirements are met. This will be accomplished with site visits to agencies and monthly review of grant activities and reports. Monitoring of agencies may be conducted by the Community Action Commission of Fayette County, OHCP, local HUD Office of Community Planning and Development, HUD’s Office of Special Needs Assistance Programs, HUD’s Office of Inspector General, HUD’s Office of Fair Housing and Equal Opportunity, or another authorized state or federal agency to determine agency compliance with the requirements of this program.

Sub-recipients are expected to make available all participant files, and any financial and program records for periodic review on a schedule to be established by OHCP. In addition, agencies will maintain participant files in compliance with any standards set by OHCP (see Statement of Agreement in the Ohio HCRP grant agreement). To prepare for a monitoring visit, the following steps will be taken:

1. CACFC will notify the award sub-recipient in writing of the intent to conduct a monitoring. The letter will include the name of the person completing the monitoring, the date and time of the monitoring and a list of the items to be monitored during the visit.

2. CACFC staff will use a monitoring tool and make that tool available prior to the visit.

3. The award recipient must ensure that the files are complete and appropriate and that the appropriate people in the award recipient’s organization and in the administrative agency organization are available during the monitoring.

4. After completing the monitoring, CACFC staff will issue a letter outlining any findings, concerns, corrective action and recommendations determined as a result of the monitoring visit.

5. The award recipient must respond to any findings and/or advisory concerns in the monitoring letter within 30 days.

6. If the audit finding remains unresolved after 30 days, the Community Action Commission of Fayette County will withhold the unresolved cost(s) from the following invoice.

# Region 16 Reporting Requirements

The Ohio Department of Development pulls reports from HMIS quarterly. In order to facilitate early detection of data quality issues the Community Action Commission will monitor the following reports monthly:

Board Report – The Community Action Commission of Fayette County holds board meetings the second Wednesday of each month. Board Reports are due no later than 12:00 P.M. on the 1st Wednesday of the month. This report should be accompanied with a narrative explaining landlord outreach and training activities that occurred during the month.

Financial Reports – Sub recipients who utilize GMS are asked to provide the following each quarter: an R&E Report, Cost Summary, and Program Check Listing. Sub recipients who do not operate on GMS will be provided with sample GMS Reports and must create a similar report utilizing their financial management software. In addition to the aforementioned reports, sub recipients must also submit copies of all invoices (receipts, purchase orders, check requests, vouchers, etc.), copies of cancelled checks, and copies of time sheets; and invoices. If the cancelled check has not been received, all documentation should be submitted the following quarter when all items to support the spending have been received. Failure to submit fiscal reports by the 25th of the month will result in the invoice being processed the following quarter.

Rent Assistance Payments – The HCRP will provide frequent reports on Rent Assistance payments to Case Manager and their supervisors.

Rental Payments & Approvals Policy

The CACFC will utilize the HMIS database for enrollment and financial assistance approvals. The CACFC will review & approve file submissions on Tuesday & Thursday. Any incomplete files will not be approved until they have been properly submitted, filled out in their entirety, and meet the program documentation guidelines. Once the assessment and enrollment are complete the HCRP Director or Coordinator will sign the Staff Certification and return it to the Case Manager. Also, when all inspection tab and financial tab documents have been collected, case managers will submit those tabs to the HCRP Director or Coordinator , who will sign off on the purchase orders and return them to the Case Manager, or in the case of sub grantee counties (Clinton, Pickaway, Ross), the HCRP Director or Coordinator will submit the Purchase Order to the Fiscal Dept. for processing. Once the fiscal department completes processing the Purchase Order, the HCRP Director or Coordinator will return the completed Purchase Order to the Case Manager, or in the case of sub grantee counties (Clinton, Pickaway, Ross), the HCRP Director or Coordinator will make a copy of the processed P.O., attach it to a check request & submit that to Fiscal for payment processing. All processed documents returned from Fiscal must be placed in the participant file. All financial requests for subsequent rental assistance **MUST be submitted by the 24th of the month** to ensure enough processing time to allow payment be sent out in compliance with lease guidelines.

# Termination of Partnerships

This MOU may be terminated by either party within 14 days by written notice. The Community Action Commission of Fayette County may terminate for any of the following occurrences:

1. Failure of the sub-grantee to fulfill in a timely and proper manner any of its obligations under this Policy and Procedure Manual.
2. Failure of the sub-grantee to submit reports that are complete, accurate, and on time.
3. Failure of the sub-grantee to use the Grant Funds for the stated purposes in the Agreement.
4. Excessive staff turnover.

# Financial Assistance and Housing Relocation and Stabilization Services

Award recipients undertaking HCRP rapid re-housing and/or homelessness prevention activities may provide both financial assistance and housing relocation and stabilization services to help those who are experiencing homelessness to be quickly re-housed and stabilized or help prevent individuals and families from becoming homeless.

***Rental Assistance***

We will strive to serve as many appropriate participants as possible, adjusting the duration and amount of assistance in order to meet the individualized need of our participants.

Assistance will be provided from the date in that the lease agreement was signed, within a  1 year period of time to enable individuals/households and families obtain and remain in appropriate rental units they select.

For example: Mary signs a lease agreement on June 1, 2016. She receives assistance up to 12 months, as long as she is re-verified every 3 months. Once she has exited the program, Mary can NOT apply for HCRP funds again until June 1, 2017.

RRH staff may provide short- or long-term rental assistance, keeping in mind that assistance is provided on an individualized basis. While RRH assistance can be provided up to 12 months, HUD expects that this will be rare and not a standard practice. The duration of rental assistance provided to households will be determined monthly by completing the HH’s Budget and identifying the amount of assistance needed to move the household into housing and keep them stabilized, as well as recertified every 90 days in compliance with HUD eligibility standards.

The rental assistance must be in compliance with HUD’s standard of “rent reasonableness,” in which the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. For more information, see HUD’s worksheet on rent reasonableness at:

www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc.

*Security and Utility Deposits*

HCRP funds may be used to pay for security deposits, including utility deposits, for eligible program participants. The agency providing the HCRP security deposit must notify the landlord that the security deposit is to be returned to the agency, not the program participant.

*Utility Payments*

Award recipients may pay for up to 6 months of utility payments, including up to six months of utility payments in arrears, for each program participant, provided that the program participant or a member of his/her household has an account in his/her name with a utility company or proof of responsibility to make utility payments, such as cancelled checks or receipts in his/her name from a utility company.

Grantees can provide utility-only assistance for active Rapid Rehousing Participants, but HUD expects that this will be rare. First, there are laws governing public utilities in many states that prevent utility companies from shutting off power toa unit during winter months, and which may also require the utility company to offer payment plans to households that miss payments. Second, staff must confirm that no other utility assistance, such as LIHEAP, is available to prevent the shut-off. If neither of these conditions exists, however, utility-only assistance may be justified under a couple of different scenarios. First, if utilities are shut off during winter months, this can result in a dangerous situation for the occupants. If the household is going to have to abandon the housing due to a lack of utilities and can avoid moving to a shelter by having utilities paid, then HCRP funds may be used for this purpose. Under another scenario, an applicant’s lease may include a provision requiring utilities be maintained for the unit by the tenant. As a result, a utility shut-off could constitute a lease violation, thus placing the household at risk for eviction. In both cases, it is the grantee or sub grantee’s responsibility to confirm and document in the case file that the utility company will in fact shut-off the utility if the amount due is not paid. If the Rapid Rehousing household is going to have to leave the housing due to a lack of utilities, can avoid literal homelessness by having utilities paid, and meets other HCRP eligibility requirements, then a household may be assisted under the Homelessness Prevention category with utility-only assistance. With regard to documentation, a copy of a utility shut-off notice or arrears statement is not sufficient by itself to document program eligibility. In addition to documenting, via an assessment, that the household has no other financial resources, support networks, or other housing options, grantees/ sub grantees must also assess and document that a household with a utility shut-off notice will become literally homeless but for HCRP assistance. In practical terms, this means that HCRP staff must assess whether the household will lose their housing if the utility is shut-off (i.e., it will constitute a lease violation causing lease termination and/or will cause housing to be unfit for human habitation). HCRP staff should attempt to obtain a copy of the participant's lease and highlight the provision related to utility obligations and consequences. If unable to obtain a lease, HCRP staff should assess and record such circumstances in the HCRP participant case file. As with other HCRP eligibility documentation, HCRP staff must first attempt to obtain third-party verification. Participant self declaration is only acceptable if third-party documentation cannot be obtained.

B. Housing Relocation and Stabilization Services

*Case Management*

Funds may be used for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them obtain housing stability. Services and activities may include counseling; developing, securing, and coordinating services; monitoring and evaluating program participant progress; assuring that program participants’ rights are protected; and developing an individualized housing and service plan, including a path to permanent housing stability after HCRP financial assistance.

*Outreach and Engagement*

HCRP funds may be used for services or assistance designed to publicize the availability of programs to make persons who are homeless or almost homeless aware of these and other available services and programs.

*Housing Search and Placement Services*

HCRP housing funds may be used to assist individuals or families in locating, obtaining, and retaining suitable housing. This may include tenant counseling; helping individuals and families to understand leases, securing utilities, making moving arrangements, representative payee services concerning rent and utilities and mediation and outreach to property owners related to locating or retaining housing. It is expected that rapid re-housing customers will be assessed prior to unit identification when possible and case managers will document all services leading up to the customer moving into the unit.

*Credit Repair*

HCRP funds may be used for services that are targeted to assist program participants with critical skills related to household budgeting, money management, accessing a free personal credit report and resolving personal credit issues.

3. Data Collection and Evaluation

Data collection and evaluation costs include appropriate costs associated with operating a Homeless Management Information System (HMIS) for purposes of collecting and reporting data required under HCRP. Eligible costs include the:

* purchase of HMIS software and/or user licenses (non-balance of state areas);
* leasing or purchasing needed computer equipment for providers, costs associated with data collection;
* entry and analysis; and
* staffing associated with the operation of the HMIS, including training.

HMIS activities that are ineligible include:

* planning and development of an HMIS;
* development of new software systems;
* contracting for program evaluation; and
* replacing state and local government funding for an existing HMIS.

4. Administrative Costs

HCRP funds may be used for accounting of grant funds, preparing reports, obtaining program audits, similar costs related to administering the grant after the award and staff salaries associated with these administrative costs. Administrative costs also include training for staff who will administer the program or case managers who will serve program participants, as long as this training is directly related to learning about HCRP.

Administrative costs do not include the costs of issuing financial assistance, providing housing relocation and stabilization services or carrying out eligible data collection and evaluation activities, as specified above, such as staff salaries, costs of conducting housing inspections, and other operating costs. These costs should be included under one of the three other eligible activity categories.

# Ineligible Activities

The following activities are ineligible for funding under HCRP:

* financial assistance to pay for expenses that are available through other ARRA programs, including child care and employment training;
* mortgage costs;
* legal fees for homeowners;
* construction or rehabilitation;
* credit card bills or other consumer debt;
* car repair or transportation costs;
* travel costs;
* food;
* medical or dental costs or medicines;
* clothing and grooming;
* home furnishings;
* pet care;
* entertainment;
* work- or education-related materials;
* cash assistance;
* developing discharge planning programs in mainstream institutions; and
* certifications, licenses, and general training classes.

**Case Manager Job Description**

|  |  |  |  |
| --- | --- | --- | --- |
| Job Title: | Case Manger | Department: | Homeless |
| Location: | CAC | Program: | HCRP, CARES |
| Reports to: | Homeless Director | Pay Level: | Starts @ $12/hr. |
| Prepared by date: | Dreama Brown 6.11.20 | Revised by/date: | Christina Blair 6.18.20 |
| FLSA Status: | Non Exempt | Travel: | In state |

**Position Summary:** The homeless programs case manager maintains caseload of approximately 20 households per county and performs program outreach in the community. Households presenting as homeless, or at risk of homelessness, are connected to emergency housing options through the Diversion Assessment and then referred to the appropriate housing or rental assistance program. Case management through these programs is focused upon participants achieving and maintaining housing stability. Services include: crisis intervention, program enrollment, housing search assistance, budgeting, lease education, landlord mediation, housing stability case plans, case note documentation and connection to community resources.

**Essential Duties & Responsibilities:**

* Conducts homeless diversion assessments to determine whether or not homelessness can be avoided and/or to determine if the individual is at risk of literal homelessness.
* Assesses the safety of current housing situation and provides crisis intervention as needed.
* Conduct comprehensive coordinated entry assessments per HUD, ODSA, and BOSCOC guidelines to guide referrals to the variety of homeless program services available internally and externally.
* Completes proper release forms, participation agreements and other documents to complete program enrollments.
* Research and identify suitable affordable housing options for households experiencing homelessness, and recruit landlords to provide housing opportunities for homeless program participants.
* Have a thorough understanding of how rental markets work, the business of being a landlord, including local housing quality standards, fair market rent, and rent reasonableness standards.
* Assist participants in finding appropriate rental housing based on their needs, preferences and financial resources.
* Help participants negotiate manageable and appropriate lease agreements with landlords and use or develop the skills to be a successful participant.
* Provide housing focused case management services using a strengths-based approach.
* Maintains lease, rental agreements, and compliance documentation in an orderly, up-to-date manner.
* Performs ongoing, creative, active outreach and engagement activities for the purposes of engaging homeless program participants in services voluntarily.
* Educate landlords about program benefits, and address potential barriers to landlord participation.
* Communicate effectively with the community and external agencies; successfully fostering relationships which enable needed resources to be accessed.
* Work with participants and property management to coordinate eviction prevention efforts and develop housing permanency plans.
* Assist participants in developing basic life skills like good neighbor skills, cleaning and organizing, arranging transportation, meal prep, budgeting, shopping or other hands-on assistance.
* Provides participants with education on participant rights and responsibilities.
* Provide budgeting and financial literacy support.
* Assist participants in obtaining and/or increasing income through benefits and employment. Case Managers may need to think creatively and consider non-traditional employment arrangements.
* Negotiate and advocate with external community resources. Assist clients with obtaining necessary documentation.
* Link participants to education and skill development opportunities consistent with their goals.
* Assist participants with accessing needed and desired medical, mental health, substance use, and psychosocial supports. Connections to these supports cannot be a condition of continued receipt of homeless assistance resources.
* Conflict resolution between program participants and/or neighbors.
* Ensures the maintenance of grant files, client files, databases and reporting. Reports submitted on time. Reviews R Minor or R Minor elevated on a monthly basis to ensure data accuracy, regardless of actual HMIS participation.
* Enters data into the HMIS system within 5 days of interaction occurrence. Runs data quality reports and cleans up data each month prior to the submission of the board report.
* Utilization of best and/or promising practices like housing first, trauma-informed care, motivational interviewing, harm reduction, etc.

Note: Duties and responsibilities are not all inclusive and may change at any time, with or without notice. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**Qualifications, education, and/or experience:** Required: Experience working with similar populations; including people who are homeless, people with mental illness, chronic health, and/or addiction disorders. High school diploma or equivalent. Driver’s license and reliable transportation is required. Ability to pass a background check and drug screen. Preferred: Bachelors or Master’s degree in a social or behavioral science (or comparable field).

**Competencies:**

Communication (oral) - Speaks clearly and persuasively in positive or negative situations, listens and gets clarification, responds well to questions, participates in meetings, and demonstrates group presentation skills as appropriate.

Communication (written) - Writes clearly and informatively, edits work for spelling and grammar, varies writing style to meet needs, presents numerical data effectively, and reads and interprets written information.

Continuous learning – Continuously strives to build own knowledge, skills and abilities. Works to obtain or maintain required licensing, credentials, or training as needed for their position.

Customer service – Manages difficult or emotional customer situations, responds promptly to requests for service and assistance, solicits customer feedback to improve service and meets commitments.

Dependability – Works independently within guidelines, accepts responsibility for own actions, keeps commitments, meets productivity standards/goals, completes work in a timely manner and adheres to the agency attendance policy.

Initiative - Takes independent actions and calculated risks, effectively identifies new opportunities and challenges, and determines how to facilitate positive outcomes.

Interpersonal skills - Focuses on solving conflict, not blaming others; maintains confidentiality; listens to others without interrupting; keeps emotions under control; remains open to others’ ideas; and tries new things.

Judgment - Displays willingness to make decisions, exhibits sound and accurate judgment, supports and explains reasoning for decisions, includes appropriate people in decision-making process, and makes timely decisions.

Leadership - Displays passion and optimism, inspires respect and trust, influences actions and opinions of others as appropriate, mobilizes others to fulfill the vision as appropriate, and provides vision and inspiration to peers and/or subordinates.

Motivation - Sets and achieves challenging goals, demonstrates persistence and overcomes obstacles, measures self against standard of excellence, and takes calculated risks to accomplish goals.

Multitasking - Displays an ability to handle multiple tasks in an efficient and timely manner.

Partnership/teamwork - Contributes to building a positive team spirit, puts success of team above own interests, exhibits objectivity and openness to others’ views, gives and welcomes feedback, and supports everyone’s efforts to succeed.

Planning/organizing - Prioritizes and plans work activities; uses time efficiently, sets short-and long-term goals and objectives, aligns objectives and actions with organizational goals, and develops realistic action and contingency plans.

Problem solving - Anticipates, identifies, and resolves problems in a timely manner; gathers and analyzes information skillfully; works to overcome obstacles; develops alternative solutions; works well in group problem-solving situations; and uses reason even when dealing with emotional topics.

Project management - Follows project plans; communicates changes and progress, completes projects on time and within budget.

Strategic thinking - Develops strategies to achieve program goals and anticipates and overcomes obstacles to the achievement of those goals.

Stewardship – Follows policy and procedure, promotes safety and security awareness, works ethically and with integrity, upholds organizational values, maintains a positive and professional demeanor, and maintains and uses equipment and materials properly.

Team Work - Ability to work with others to carry out the goals of the homeless department. Trust with supervisors and staff is essential.

Technology - Computer literate in internet browsing, email, Microsoft Office and data entry. Willingness and ability to learn web-based data systems for recordkeeping.

Respect – Treats people with dignity and respect, values diversity, demonstrates cultural competence, promotes a harassment-free environment, keeps commitments, and inspires the trust of other. Implements programming in alignment with agency’s person-centered philosophies.

**Organizational Relationships/Authority:** May be asked to assist with overseeing volunteers.

**Physical Requirements:** Requires standing, bending, reaching, sitting in working with office equipment such as a computer, telephone, adding machine, phone, etc. May need to ascend and descend stairs. Routinely requires the ability to move or transport supplies up to 30 pounds.

**Work Environment:** Work is primarily performed in a secure office setting, as well as, an office setting in congregate facilities. Some community-based and home-based services may be performed on a regular basis.

**Occupational Health and Safety:**

* Responsible for compliance with workplace policies and procedures for risk identification, risk assessment, and risk control.
* Responsible for active participation in activities associated with the management of workplace health and safety.
* Identification and reporting of health and safety risks, accidents, incidents, injuries and property damage at the workplace.
* Correct utilization of appropriate personal protective equipment if required by employment.

**Applicable policies:** CAC is an equal opportunity employer that complies with the Americans with Disabilities & Health Insurance Portability and Accountability Acts. CAC is an at-will employer.

|  |  |  |  |
| --- | --- | --- | --- |
| Employee Signature |  |  | Date |

|  |  |  |  |
| --- | --- | --- | --- |
| Supervisor Signature |  |  | Date |

**Region 16 HCRP RRH Policy & Procedure Manual Acknowledgement Form**

This policy and procedure manual has been prepared for your information and understanding of the policies, procedures, and requirements of the Region 16 Rapid Re-Housing (RRH) Program. Please read it carefully. Upon completion of your review of this handbook, sign the statement below, and return it to the HCRP Director by the due date. A copy of this acknowledgment appears at the back of the handbook for your records.

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, have received and read a copy of the Community Action Commission of Fayette County’s Region 16 HCRP Policy and Procedures Manual which outlines the goals. policies, procedures, and requirements of the HCRP, as well as my responsibilities as an employee and/or sub grantee.

I have familiarized myself with the contents of this manual. By my signature below, I acknowledge, understand, accept, and agree to comply with the information contained in the Homeless Prevention and Rapid Re-Housing Policies and Procedures Manual provided to me by the Community Action Commission of Fayette County. I understand this handbook is not intended to cover every situation which may arise, but is simply a general guide to the goals, policies, procedures, and requirements of the Community Action Commission of Fayette County, Ohio Development Services Agency, and the Department of Housing and Urban Development.

I understand that if I have questions or concerns at any time about the manual, I will consult my immediate supervisor and/or HCRP Director for clarification.

I understand that the Rapid Re-Housing Policies and Procedures Manual provided to me by the Community Action Commission of Fayette County is not a contract and should not be deemed as such.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
(Signature)

Please return by: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_