

## **Balance of State Continuum of Care Program Standards for ETH-Funded Rapid Re-Housing Programs**

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

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

### **DEFINITIONS:**

**Family** - includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status: (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or (2) A group of persons residing together, and such group includes, but is not limited to: (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family); (ii) An elderly family; (iii) A near-elderly family; (iv) A disabled family; (v) A displaced family; and (vi) The remaining member of a tenant family. 24 CFR 5.403.

**Homeless** – means **(1)** *an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;* **(2)** An individual or family who will imminently lose their primary nighttime residence, provided that: (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing; **(3)** Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the

Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or **(4) Any individual or family who:** (i) *Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;* (ii) *Has no other residence;* and (iii) *Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.* 24 CFR 578.3.

**Rapid Re-Housing** –An intervention designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve stability in that housing. Rapid re-housing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are typically tailored to the unique needs of the household. The core components of a rapid re-housing program are housing identification and relocation, short-and/or medium term rental assistance and move-in (financial) assistance, and case management and housing stabilization services. This assistance is subject to the definitions and requirements set forth in 24CFR§576.2 “Homeless” paragraph (1) and paragraph (4) who are residing in a place set forth in (1), 24CFR§576.105, 24CFR§576.106 and 24CFR§576.400. (24CFR§576.104 & *Core Components of Rapid Re-Housing*, National Alliance to End Homelessness)

## **PERSONNEL**

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

### **CRITERIA:**

1. The agency selects, for its service staff, only those employees and/or volunteers with appropriate knowledge, or experience, for working with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
2. The program provides training to all paid and volunteer staff on both the policies and procedures employed by the program and on specific skill areas as determined by the program.
3. All paid and volunteer service staff participate in ongoing and/or external training, and development to further enhance their knowledge and ability to work with individuals and

families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.

4. For programs that use HMIS, all HMIS users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
5. Agency staff with responsibilities for supervision of the casework, counseling, and/or case management components have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
6. Staff with supervisory responsibilities for overall program operations shall have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
7. All staff have a written job description that at a minimum addresses the major tasks to be performed and the qualifications required for the position.
8. The program operates under an affirmative action/civil rights compliance plans or letters of assurance.
9. Case supervisors review current cases and individual service plans on a regular and consistent basis to ensure quality/coordinated services.

### **CLIENT INTAKE PROCESS**

**STANDARD:** The program will be an active member in its regional Coordinated Assessment system. The program will have minimal entry requirements to ensure the most vulnerable of the population are being served. The program will ensure active client participation and informed consent.

#### **CRITERIA:**

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

## **PRIORITIZATION**

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

### **CRITERIA:**

1. The program will screen/assess each household for barriers to obtaining housing and barriers to retaining housing.
  - a. Barriers to obtaining housing only include problems that a prospective landlord could find out during the application and screening process AND could use as a reason to deny a rental application, whether or not the manner of determination and use is legal or illegal.
  - b. Barriers to retaining housing are defined by the direct impact they have had on the on the household's previous housing history, and the potential for affecting future housing.
2. The program will categorize each applicant household based on number and severity of barriers.
3. Programs will utilize the Rapid Re-Housing Triage Tool developed by the National Alliance to End Homelessness, Center for Capacity Building (see attachment) to match the household to the most appropriate housing option.
  - a. **Category 1:** Short-term Rapid Re-Housing assistance is offered only as payer of last resort AND if there are no other eligible households in categories 2 through 5.
  - b. **Categories 2 & 3:** Prioritized for Rapid Re-Housing.
  - c. **Category 4:** Prioritized for Transitional Housing, or Rapid Re-Housing if no Transitional Housing program exists in the local CoC.
  - d. **Category 5:** Prioritized for Permanent Supportive Housing, or Transitional Housing if no Permanent Supportive housing exists in the local CoC, or Rapid Re-Housing Housing if no Transitional Housing program exists in the local CoC.
4. Service prioritization must look at all programs and services within the local CoC.

## **RAPID RE-HOUSING**

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

### **CRITERIA:**

1. The program explains the program rules and expectations prior to admitting the individual or family into the program. These rules and expectations should attempt to assure fairness, to avoid arbitrary decisions that may vary from client to client, or staff to staff.
2. In locating housing, the program considers the needs of the individual or family experiencing homelessness.
3. Programs will assess potential housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness prior to the participant signing a lease with the landlord, and the program signing a rental assistance agreement with the landlord.

4. The program provides assistance in accessing suitable housing.
5. The program may provide assistance with rental application fees, moving costs, temporary storage fees (up to 3 months), security deposits (up to 2 months), last month's rent, utility deposits, utility payments (including up to 6 months arrears), rental arrears (one-time payment of up to 6 months arrears), credit repair, and legal services related to obtaining or retaining permanent housing.
6. The program signs a rental assistance agreement with the landlord. The program participant signs a lease with the landlord. The program and the participant sign a housing stabilization plan.
7. The program will pay 100% of the participant's first month's rent. Thereafter, participant contribution toward rent will be 30% of the household's monthly adjusted gross income, payable directly to the landlord.
  - a. If the household moves into housing between the 1<sup>st</sup> and the 15<sup>th</sup> of the month, that month will be considered the "first month." If the household moves into housing between the 16<sup>th</sup> and the end of the month, the following month will be considered the "first month." In this situation, the program will provide 100% of the pro-rated rent in addition to the first month's rent.
8. Up to 100% of the security deposit may be paid with ESG dollars, as based on available funding. Programs are strongly encouraged to leverage other sources of funding to pay for security deposits.

### **CASE MANAGEMENT SERVICES**

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

**CRITERIA:**

1. Individual case management is provided to program participants at least monthly. Case management includes the following:
  - a. ***Housing Stability Case Management*** assists participants in locating and obtaining suitable permanent housing, including:
    1. Assessment of housing barriers, needs, and preferences
    2. Development of an action plan for locating housing
    3. Housing search
    4. Outreach to and negotiation with owners
    5. Tenant counseling
    6. Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness
    7. Assistance with submitting rental applications
    8. Understanding leases
    9. Arranging for utilities
    10. Making moving arrangements

- b. **Ongoing Case Management** services include assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who has obtained permanent housing through the Rapid Re-Housing program by, for example:
1. Developing an individualized housing and service plan, including planning a path to permanent housing stability
  2. Developing, securing, and coordinating services
  3. Obtaining Federal, State, and local benefits
  4. Monitoring and evaluating program participant progress
  5. Providing information about, and referrals to, other providers
  6. Conducting re-evaluations to determine on-going program eligibility
- c. **Other Services** may be provided, such as:
1. Legal Services to resolve a legal problem that prohibits a program participant from obtaining or retaining permanent housing, including:
    - a. Client intake
    - b. Preparation of cases for trial
    - c. Provision of legal advice
    - d. Representation at hearings
    - e. Counseling
    - f. Filing fees and other necessary court costs
  2. Mediation between the program participant and the owner or person(s) with whom the participant is living
  3. Credit Repair, including:
    - a. Credit counseling
    - b. Accessing a free personal credit report
    - c. Resolving personal credit problems
    - d. Other services needed to assist with critical skills related to household budgeting and money management
  2. Case Management includes the following types of contact: home visits, office visits, meeting at a location in the community, or phone calls.
  3. The program will re-evaluate the household for continued eligibility every three months. To continue to receive Rapid Re-Housing assistance, the household must demonstrate:
    - a. Lack of resources and support networks. The household must continue to lack sufficient resources and support networks to retain housing without program assistance.
    - b. Need. The program must determine the amount and type of assistance that the household needs to (re)gain stability in permanent housing.
    - c. Income. The household's annual income must be at or below 30% CMI.

### **SERVICE COORDINATION**

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

**CRITERIA:**

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

**TERMINATION**

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

**CRITERIA:**

1. In terminating assistance to a program participant, the agency must follow the due process provisions set forth in 24 CFR §576.402, as well as the following process: (i) providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (ii) written notice to the program participant containing a clear statement of the reason for termination; (iii) a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and (iv) prompt written notice of the final decision to the program participant.
2. Termination under this section does not bar the program from providing further assistance at a later date to the same individual or family.
3. Programs are encouraged to re-house, rather than terminate assistance to households that are evicted from their housing while participating in the Rapid Re-Housing program.

**FOLLOW-UP SERVICES**

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

**CRITERIA:**

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

**CLIENT FILES**

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

**CRITERIA:**

1. The file maintained on each participant should, at a minimum, include information required by HUD or the State of Wisconsin ETH Grant Administrator, participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, and any follow-up and evaluation data that are compiled.
2. Client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual. At a minimum, programs must record the date the client enters and exits the program, and update the client's information as changes occur. This criterion applies only to those agencies which use HMIS.
3. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate except to project staff and other agencies as required by law. Participants must give informed consent to release any client identifying data to be utilized for research, teaching and public interpretation.
4. All records pertaining to ESG funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records. Records pertaining to other funding sources must adhere to those record retention requirements.

**EVALUATION AND PLANNING**

**STANDARD:** Ongoing program planning and evaluation will be conducted.

**CRITERIA:**

1. The program has written goals and objectives for its services to meet the outcomes required by HUD and the State of Wisconsin.



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