## Standards for CoC- and ESG-Funded Rapid Re-Housing Programs in the Metropolitan Denver Continuum of Care

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Note: In this document the term **grantee** refers to the entity that is receiving funding to administer a rapid re-housing program. Other terms that may be used in place of grantee are project site, program, agency, recipient, or subrecipient. **Participant** refers to the household receiving services. Other terms that may be used for participant include client or program participant.

## Introduction

The Metropolitan Denver Continuum of Care (CoC) has developed these standards in accordance with Title 24 of the Code of Federal Regulations.<sup>1</sup> The standards are applicable to all projects that receive CoC or Emergency Solutions Grants (ESG) Rapid Re-Housing (RRH) funding through the CoC and are intended as the <u>basic minimum standards</u> that CoC and ESG grantees are expected to meet in operating their RRH projects. All CoC-funded RRH projects must also comply with the U.S. Department of Housing and Urban Development (HUD) Notice of Funding Availability (NOFA) under which the project was originally awarded.

Metro Denver Homeless Initiative (MDHI) encourages all other funders of RRH to voluntarily align with these standards when possible so that people experiencing homelessness are treated similarly regardless of funding source and county of origin. Appendix A contains a current list of the other funders and RRH programs that have adopted the standards. All funds used to provide services under these programs, including any program income and matching funds, must be administered in compliance with these standards. Project-level modifications can be considered, but only for cause and following CoC approval. The CoC is developing related performance benchmarks, and once they are established, the performance of each RRH project will be evaluated based on the outcomes it has achieved and their impact on CoC-wide performance measures.

The goal of these standards is to merge key elements of the HUD regulations with the processes and priorities of the CoC and guarantee that RRH funding is administered consistently, transparently, and as effectively as possible. The CoC will continue to build upon and refine this document as RRH practices evolve, to maintain and improve the following:

- Project compliance with 24 CFR 576 (ESG interim rule), 24 CFR 578 (CoC Program interim rule), additional requirements contained in the CoC Program NOFA under which the project receives funding, and related applicable guidance.
- Program accountability to individuals and families experiencing homelessness.
- The uniformity of RRH practices and participants' expectations of and experiences in RRH programs.
- Project staff competence and training specific to the target population being served.
- Model policy guidelines for RRH programs.
- Consistency among all providers of RRH assistance and their baseline knowledge of best practices, no matter the funding stream.

The standards detailed in this document encompass the following:

<sup>&</sup>lt;sup>1</sup> 24 CFR 91.220(I)(4)(i), 576, and 578.

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance.
- Policies and procedures for coordination among RRH assistance providers, other homeless assistance providers, and mainstream service and housing providers.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive RRH assistance.
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving RRH assistance.
- Standards for determining how long a participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a participant, including the limits, if any, on the rapid re-housing assistance that each participant may receive, such as the maximum amount of such assistance, maximum number of months the participant may receive assistance, or the maximum number of times the participant may receive assistance (CoC and ESG).

## Program Philosophy and Design

The National Alliance to End Homelessness (NAEH) published a Solutions Brief in 2016 entitled *Rapid Re-Housing Performance Benchmarks and Program Standards*.<sup>2</sup> Organizations implementing RRH and funders who are supporting or planning to support RRH should use the CoC standards in this document, which were developed based on the NAEH brief, as their guide for RRH.

RRH is a short- to medium-term housing intervention designed to help individuals and families quickly exit homelessness, return to housing in the community (usually in the private market), and not experience homelessness again. RRH is a Housing First intervention, meaning that the primary focus is on moving households into housing quickly, without preconditions (such as those relating to employment, income, criminal records, "motivation," or sobriety). Participating programs are expected to maximize the number of households served by accepting all referrals received through the CoC's OneHome Coordinated Entry System and by not screening out households. Additionally, the primary focus of assessments and assistance should be on resolving the participant's current housing crisis. This means a focus on the circumstances of the crisis, the household's barriers to obtaining and maintaining housing, and the reasons they are unable to solve their housing crisis without RRH assistance.

RRH resources and services must be tailored to the unique needs of the household. The primary components of an RRH program include housing identification, rental and move-in assistance,

<sup>&</sup>lt;sup>2</sup> <u>https://endhomelessness.org/resource/rapid-re-housing-performance-benchmarks-and-program-standards/</u>

and case management services. While an RRH program must have all three of these services available, it is not required that a single entity provide all three services nor that a household utilize them all. All participation in services should be voluntary and driven by the household.<sup>3</sup> Program staff must be trained in the principles of Housing First approaches and oriented to the basic program philosophy of RRH. Under no circumstances should participation in services be a condition of occupancy. In other words, an RRH program may not terminate a participant solely for refusing to participate in supportive services. It is permissible, however, to require participation in general, low-demand case management with a primary goal of engagement and consistency with Housing First. While having such a requirement is allowable, failure to meet with the case manager must not lead to an automatic eviction or termination from the RRH program.

RRH programs must have well-defined and written "screen-in" processes that use consistent and transparent decision criteria.

- Eligibility criteria for the program must not include a period of sobriety, a commitment to participation in treatment or other services, or any other criteria designed to "predict" long-term housing stability, other than a willingness to work on a self-directed housing plan.
- Priority should be given to households that are the least likely to exit homelessness without assistance—not to the households considered most likely to succeed in RRH, regardless of participants' scores on assessment tools or current income.
- Disabilities should be assessed only in regard to their role in causing past housing instability or loss and when related to the household's ability to obtain a disability-specific benefit, service, or accessible unit.
- Programs must participate in the Homeless Management Information System (HMIS), collecting all required data and taking steps to achieve quality data entry. Victim services providers must not enter client-level data into HMIS; instead, they must use a comparable database to collect client-level data over time and generate unduplicated, aggregate reports based on that data.
- Programs must participate in and accept all referrals from OneHome and must participate in efforts to improve the efficiency and quality of referrals when necessary.
- Programs must maintain and distribute information on alternative, available resources for clients who wish to access other services in addition to those offered by the program.
- Programs must have an ongoing performance improvement process that includes evaluations of household outcomes and household feedback.

<sup>&</sup>lt;sup>3</sup> <u>https://endhomelessness.org/resource/rapid-re-housing-a-history-and-core-components/.</u>

## HUD COC- and ESG-Funded Rapid Re-Housing Eligibility

#### **Eligibility Requirements**

Initial eligibility for RRH projects funded with *either* ESG or CoC program funding shall be limited to individuals or families who are either

- Literally homeless (defined as an individual or family who is living in a public or private place not meant for habitation or in a temporary shelter, which includes congregate shelters); or
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions.<sup>4</sup>

This requirement is consistent with the ESG Program interim rule as well as requirements included in the CoC Program NOFAs since fiscal year (FY) 2013 (which go beyond the eligibility requirements for RRH included in the CoC Program interim rule).

There shall be no minimum or maximum income limits for either ESG- or CoC-funded RRH projects when determining the *initial* eligibility of a household.

Grantees must conduct interim evaluations of participants (for ESG this is referred to as recertification). The first evaluation must occur 3 months after enrollment. Any additional months of assistance or subsidies beyond the first 3 months may be provided on a month-to-month basis (with reevaluations each month). To continue to receive rental assistance under both ESGand CoC-funded programs, the participant must continue to lack sufficient resources and support networks to retain housing without RRH assistance. In interim evaluations, the grantee must also reassess the type and amount of assistance that the household is receiving and make adjustments as needed.

While interim evaluations must be completed more frequently, annual reevaluations are required by HUD for participants in ESG-funded RRH projects. To remain eligible, households must have income at or below 30 percent of the Area Median Income (AMI).

#### **Documenting Eligibility**

Organizations receiving grant funding for RRH under the CoC and ESG programs must document and maintain records related to participant eligibility and the services provided to participants. Following is an overview of these requirements:

• Homeless Status: Maintain records documenting acceptable evidence of participants' homeless status. Acceptable evidence generally includes third-party written verification of the participant's stay in an unsheltered location, in an emergency shelter, or in

<sup>&</sup>lt;sup>4</sup><u>https://www.hudexchange.info/resources/documents/HomelessDefinition\_RecordkeepingRequirementsandCrite</u> <u>ria.pdf</u>

another eligible location. These records must comply with HUD's recordkeeping requirements.<sup>5</sup>

- When documenting homeless status, HUD requires compliance with their preferred order of priority. This means that homeless status must be documented first with third-party written verification of homelessness (e.g., HMIS record, documentation on letterhead from shelter). If that documentation is not attainable, only then can third-party oral verification be used as documentation, and only after case workers have documented their due diligence in attempting to obtain third-party written verification. Selfcertification of homeless status is permitted only when neither third-party written nor third-party oral verification can be obtained, and due diligence has been documented.
- Other Program Eligibility Verification: Document compliance with any other program eligibility criteria specific to the individual project.
- Services and Assistance Provided: Grantees must keep records for all participants that outline the services provided, including:
  - Evidence that, at a minimum, quarterly assessments of service needs were completed (certain programs require more frequent assessments).
  - When a participant is terminated from the program, evidence that all applicable federal requirements were followed.
- Annual Income: For the purposes of documenting eligibility upon reevaluation and when any kind of rent is paid by program participants, grantees must keep the following documentation of annual income:
  - Income evaluation form.
  - Source documents (wage statements, bank statements, etc.).

In addition to these requirements, where RRH projects are serving persons experiencing chronic homelessness, and where RRH may be used as a bridge to a permanent supportive housing (PSH) placement, chronic homelessness must be documented. The recordkeeping requirements in the *Defining "Chronically Homeless" Final Rule* apply only to CoC-funded PSH projects that are required to serve this population (i.e., dedicated PSH). However, CoC- and ESG-funded RRH projects that serve persons experiencing chronic homelessness where the household may ultimately need permanent supportive housing *should use the time in which the household is in the RRH project* to gather supporting third-party documentation that will be required at the point of intake into PSH. The PSH grantee will be required to demonstrate that the household entered the RRH project.

<sup>&</sup>lt;sup>5</sup> <u>https://www.hudexchange.info/resources/documents/HomelessDefinition\_RecordkeepingRequirementsand</u> <u>Criteria.pdf</u>.

For more information, view the <u>Defining "Chronically Homeless" Final Rule</u> and <u>accompanying</u> <u>FAQs about recordkeeping requirements</u>. A recorded <u>webinar and supporting materials</u> related to the definition of chronically homeless is also available, and HUD recently released the following tools to assist grantees with this definition:

- <u>Flowchart of HUD's Definition of Chronic Homelessness</u>: This tool guides users through HUD's definition primarily via "Yes" or "No" questions, providing an interactive way to help users understand who meets the definition and what documentation is required.
- <u>Sample Chronic Homelessness Documentation Checklist</u>: This checklist provides an optional way to help record chronic homelessness for projects that need such documentation.

## Coordination with Mainstream and Targeted Homeless Services Providers

The Metropolitan Denver CoC expects every agency that receives CoC or ESG funding to access and coordinate with mainstream and other targeted homeless resources.

Further, every agency that receives CoC or ESG funding is required to participate fully in and accept referrals only through the CoC's OneHome Coordinated Entry System.

## Prioritizing Assistance for COC- and ESG-Funded RRH

All CoC- and ESG-funded RRH projects will be targeted to the highest-need households to the maximum extent possible. Each grantee will adopt policies and procedures that "screen in" households with higher barriers to housing and will not impose additional targeting or screening criteria designed to determine whether a household is "housing ready," such as sobriety, employability, or willingness to participate in services.

All households served in CoC- and ESG-funded projects must be referred through the CoC's OneHome Coordinated Entry System using its current prioritization method.<sup>6</sup> Prioritization policies are established by the CoC in coordination with grantees and partners and applied CoC-wide. There shall be no project-specific waiting lists or project-specific prioritization policies that exist outside of coordinated entry.

## Determining Participant Contribution Toward Rent and Utility Costs

Occupancy charges—a participant's total contribution towardrent and utilities—must be universally and consistently applied to all participants served in CoC- and ESG-funded RRH programs. Rental assistance should be provided in a flexible and progressive manner that is tailored to the household's needs. The policy of the Metropolitan Denver CoC is that financial assistance should be provided in amounts sufficient to ensure the likelihood of positive housing

<sup>&</sup>lt;sup>6</sup> <u>http://www.onehomeco.org/governance</u>.

outcomes after the assistance has ended. RRH projects are to provide just enough rental assistance to ensure that the participant is working toward housing stability and will not become homeless again. Following are the CoC's minimum standards for determining what percentage or amount of rent and utilities costs each participant shall pay while receiving CoC-or ESG-funded RRH assistance:

- The participant's income shall be verified prior to their approval for initial and additional financial assistance. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the participant's project file. This file shall also contain the participant's plan to remain housed when their assistance comes to an end, by increasing income, decreasing expenses, or both.
- All households will undergo income recertification and subsidy recalculation at the end of each 3 months of program participation. Income should be *evaluated* each month to help the provider determine what types of services the participant may need that month. A rental subsidy *can* be recalculated monthly but *must* be recalculated at least once every 3 months.
- Each CoC- and ESG-funded RRH grantee must establish policies concerning notification of changes in participants' income or family composition.
- Households are to receive a maximum monthly subsidy amount that is based on the household's size, composition, and income, and on the current Federal Market Rent (FMR) (ESG) and/or rent reasonableness (CoC and ESG) standards. Based on these factors, RRH providers will calculate a maximum rental subsidy for the household and, to the extent possible, decrease the subsidy as the household's length of time in the RRH program increases.
- Grantees are expected to provide hardship exemptions from any rental charges if such charges could lead to loss of housing for the assisted household.
- RRH projects are to calculate rent as the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities established by the public housing authority (PHA) for the area in which the housing is located (24 CFR 578.37(a)(1)(ii)(B)). Therefore, if utilities are not included in a participant's rent, and rent is part of the RRH program's rental assistance calculation, that calculation must incorporate the applicable utility allowance, and the participant must be reimbursed for any amount by which the allowance exceeds the participant's share of rent. This utility reimbursement may be paid using rental assistance funds.<sup>7</sup>

<sup>&</sup>lt;sup>7</sup> <u>https://www.hudexchange.info/resources/documents/Notice-CPD-17-11-Determining-Program-Participant-Rent-Contribution-in-the-CoC-Program.pdf</u>.

## Determining the Duration of Financial Assistance

The minimum standards for determining how long a participant shall be provided with rental assistance and how the amount of that assistance shall be adjusted over time are as follows:

- Participants shall receive approval for the minimum amount of financial assistance necessary to end their homelessness. Financial need must be documented in the participant's file each time their assistance is evaluated, which must be done at least once every 3 months. Participants shall not be approved for more rental assistance than can be justified given their current income and expenses.
- Generally, RRH assistance shall not be provided for more than 24 of the months in any 36-month period.
  - The duration of short-term rental assistance shall not exceed 3 months.
  - The duration of medium-term rental assistance shall exceed 3 months, but not exceed 24 months.
- For all CoC- and ESG-funded RRH projects, the initial term of assistance shall be 3 months. At the end of the initial 3-month term, the grantee shall evaluate the participant's progress and financial situation and offer assistance on a month-to-month basis. After 6 months, the grantee shall reassess the participant and determine whether continued assistance is needed. RRH assistance can be provided for up to 9 months total as long as the household continues to lack the financial resources and support networks needed to remain in housing. Exceptions to this 9-month limit may be made at the discretion of the RRH program, in consultation with MDHI, but in no case may assistance exceed the CoC and ESG regulation of 24 months.
  - If it is determined that the participant will be unlikely to exit the program without further financial assistance and that a more permanent subsidy will be required, the RRH assistance can be used as a bridge while the grantee begins the process of working with the CoC and OneHome to identify a more appropriate placement, such as a PSH project, based on client eligibility and available resources.
- Additional requirements regarding how long a participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time can be established by grantees, but only in collaboration with the CoC. Any such requirements must be clearly communicated to participants.
- CoC-funded RRH projects cannot pay for rent arrears. Payments for up to 6 months of rent arrears can be made by ESG-funded RRH projects, provided that these are one-time payments that include any late fees. Such payments cannot include past rent that is in collections.
- Payments for rental assistance shall comply with applicable HUD standards. In ESGfunded RRH projects, rental assistance may cover up to the FMR for a unit and units

must comply with HUD's rent reasonableness standards. For CoC-funded RRH, rent reasonableness is the applicable rent standard and units in a structure must comply with HUD's rent reasonableness standard.<sup>8</sup>

- Calculation of the rental payment amount shall include only the monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and, if the participant pays separately for utilities, the monthly utility allowance established by the PHA serving the area in which the housing is located.
- Payments for rental assistance shall be made only when:
  - There is a legally binding, written lease between the unit's owner and the participant. For participants receiving tenant-based rental assistance (TBRA) under the CoC Program, the lease must be for an initial term of no less than 1 year, must be renewable for a minimum term of 1 month, and may only be terminable for cause. For participants receiving project-based rental assistance (PBRA) under the ESG Program, the lease must have an initial term of 1 year. There is no minimum lease period for TBRA under ESG. This requirement for a lease does not apply to payments made for rent arrears by ESG-funded RRH providers.
  - There is a rental assistance agreement between the RRH provider and the unit's owner, which sets forth the terms under which rental assistance will be provided, including the requirements specified above. The rental assistance agreement must include a requirement that the owner provide the grantee with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and must include the same payment due date, grace period, and late-payment penalty requirements as are in the participant's lease.
- Payments made for any late-payment penalties incurred by the RRH provider shall not be claimed for reimbursement.
- Payments shall be made only for units that have been inspected for HUD Housing Quality Standards (CoC-funded RRH) or Habitability Standards (ESG-funded RRH) and reinspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet these standards.
- Lead-based paint requirements must be evaluated for any chipped, cracking, or peeling paint. All tenants with children under the age of 6 who are in housing built prior to 1979 are required to be given a lead-based paint pamphlet and to certify that they received the pamphlet. A copy of this certification must be placed in the participant's file.

<sup>&</sup>lt;sup>8</sup> <u>https://www.hudexchange.info/resources/documents/ESG-Rent-Reasonableness-and-FMR.pdf</u>

#### Limitations on Tenant-Based Rental Assistance

When TBRA is provided, the rental assistance agreement with the unit owner shall be terminated without further payments if

- The participant moves out of the unit, or
- The lease terminates and is not renewed.

#### Limitations on Project-Based Rental Assistance (ESG-funded RRH only)

Payments shall be made only under the following conditions:

- The lease has an initial term of 1 year.
- The rental assistance agreement may cover one or more permanent housing units in the same building.
- Each unit covered by the rental assistance agreement is occupied by an ESG-funded RRH participant.
- Payments are made for up to 100 percent of the first month's rent only if the participant signs a lease and moves into the unit before the end of the month.

Financial assistance provided to participants under ESG- and CoC-funded RRH programs may not exceed the limitations set forth below:

- Use with other subsidies. Payments shall not be provided for a participant who is receiving the same type of financial assistance through other public sources.
- **Rental application fees.** Payments for application fees shall be made only when the owner requires that all applicants pay the fee.
- Security deposits. Payments for these deposits shall not exceed 2 months of rent.
- Last month's rent. Payments for the final month of rent incurred by a participant prior to entry into the RRH program shall not exceed 1 month's rent and shall be included in calculating the participant's total rental assistance.
- Utility deposits. Payments shall be made only for gas, electric, water, and sewage deposits.
  - Utility payments. Payments shall not exceed 24 months per participant, including no more than 6 months of payments in arrears per utility. A partial payment counts as 1 month.
  - Payments shall be made only if the utility account is in the name of the participant or a member of the same household.
  - Payments shall be made only for gas, electric, water, and sewage costs.

- Participants shall not receive more than 24 months of utility assistance within any 3-year period.
- **Moving costs.** One-time moving expenses are eligible for payment.

#### Minimum Program Requirements

- Program staff must be trained on the regulatory requirements of all RRH funding streams and on the ethical use and application of the program's financial assistance policies.
- The program must have clearly defined policies and procedures for determining the amount of financial assistance provided to a household, as well as defined and objective standards for determining when case management and financial assistance should continue and end. Programs are required to share these written policies and standards with MDHI.
- The program must have clearly defined, written standards for participant assessments and intake, determination of participants' eligibility, initial evaluation (certification) of participants, reevaluation (recertification) of participants, terminating assistance, appeals of terminations, emergency transfers under the Violence Against Women Act (VAWA), and participant files.
- When households are expected to pay an amount toward their housing, the program must have written policies and procedures for determining that amount, and the amount must be reasonable in relation to the participant's income.
- A progressive approach must be used to determine the duration and amount of rental assistance. Policies detailing this approach should cover decision-making guidelines and reevaluation processes.
- The program must provide, when needed, financial assistance for housing costs.
- The program must issue checks quickly and on time and must have the capacity to track payments to landlords and other vendors.
- The program must have the capacity to pay reasonable back rent and utility arrears that directly prevent a household from being able to sign a lease. Rent arrears cannot be paid once they are in collections.

- The program must help households meet basic needs at move-in.
- The process used to transition the household off of financial assistance must be coordinated with case management efforts that help the household assume and sustainably cope with their housing costs.

# Determining Type, Amount, and Duration of Housing Stabilization and/or Relocation Services

RRH assistance of all types cannot exceed 24 months in any 3-year period. Below are the minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to program participants. These standards include the limits, if any, applicable to such services, such as the maximum amount of services that can be provided, the number of months for which services may be provided, and the number of times a participant may receive such assistance.

#### Housing Search and Placement Services

Payments shall be made only for helping participants to locate, obtain, and retain suitable permanent housing by providing one or more of the following services:

- Assessment of housing barriers, needs, and preferences. Development of an action plan for locating housing.
- Housing searches.
- Outreach to and negotiation with housing owners.
- Assistance with submitting rental applications and understanding leases.
- Assessment of housing for compliance with ESG Program requirements for habitability, lead-based paint, and rent reasonableness.
- Assistance with obtaining utilities and making moving arrangements.
- Tenant counseling.

#### Minimum Program Requirements for Housing Search and Placement Services

- The program must offer a standard, basic level of support to all landlords who lease to program households. This support must be detailed in a written policy distributed to landlords and made available to MDHI.
- The program must have a detailed policy covering the type of assistance provided to help households find and secure housing. Program staff must explain and distribute this policy to households upon entry to the program. The program must also have a written policy that requires staff to explain to household's basic landlord-tenant rights and responsibilities and the requirements of their specific lease.
- The program shall continually engage in the recruitment and retention of landlord partners and shall have a system to track unit vacancies, locations, characteristics, and costs.
- The program must provide households with multiple housing choices within practical constraints.

- The program must help households make informed housing choices with the goal that the household will be able to maintain their housing after leaving the program.
- When ending financial assistance, the program must provide information to the landlord about how they can contact the program again if needed and what kinds of follow-up assistance may be available.

#### Housing Stability Case Management

Payments shall be made only for assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing. This assistance may comprise one or more of the following services:

- Using the CoC's OneHome Coordinated Entry System.
- Conducting the initial evaluation, including verifying and documenting participant eligibility.
- Counseling.
- Developing, securing, and coordinating services and obtaining federal, state, and local government benefits.
- Monitoring and evaluating participant progress.
- Providing the participant with information and referrals to other providers.
- Developing an individualized housing and service plan and supporting the participant in accomplishing the plan.
- Conducting reevaluations.

Housing stability case management services provided while a participant is seeking permanent housing may be supported for up to 30 days only with ESG funding. For CoC-funded assistance, there is no limit on how many months a grantee can provide services before a participant is housed, so long as the grantee is *actively* helping the participant to identify a unit as quickly as possible. Additionally, supportive services may be provided for no longer than 6 months after the rental assistance stops.

Housing stability case managers are expected to meet with participants in their homes and must have a minimum of one contact per month with participants. All contact between case managers and participants shall be documented in case notes.

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations, shall be determined by the individual service provider's policies and clearly communicated to participants.

#### Minimum Program Requirements for Housing Stability Case Management Services

- Case managers' job descriptions must direct them to focus on housing and to use strengths-based practices.
- Case managers must work closely with housing locator staff to match the household to an appropriate unit as quickly as possible.
- Case managers shall be trained on RRH case management strategies and related evidence-based practices as well as on program policies and community resources.
- Except where dictated by the funder, program households shall direct when, where, and how often case management meetings occur.
- Case managers must respect participants' homes as they do their own, scheduling appointments ahead of time, only entering when invited in, and respecting personal property and the participant's wishes.
- When participation in case management services is not mandated by federal or state regulations, such participation shall be voluntary.
- Programs must have clear safety procedures for home visits. They must train their staff on these procedures, post the procedures in a clearly visible manner in their offices, inform participants about the procedures at intake, and, if and when changes are made, communicate the changes to participants and staff.
- Programs must have clearly defined relationships with employment and income programs that they can refer participants to when appropriate.
- Programs must have clearly defined policies and objective standards about when case management should be continued and ended.
- At enrollment or within 72 hours of enrollment, programs must conduct a tenancy barriers assessment.
- Programs must connect participants to community resources that help them to (1) resolve or navigate tenant problems that landlords may screen for on rental applications, (2) obtain necessary documentation, (3) prepare for successful tenancy, and (4) successfully accomplish other move-in activities.
- Programs must offer opportunities for participants to learn basic tenancy skills.
- Program staff must work directly with the household and landlord to resolve tenancy issues without threatening the household's tenancy.
- When appropriate, case managers should work with participants to build their communication skills so they can better respond to or negotiate with a landlord.
- When necessary, case managers should help households avoid evictions and maintain positive relationships with their landlords.

- Programs' housing plans for individual participants should focus on how the participant can maintain a lease and address barriers to housing retention; on improving the participant's understanding of landlord/tenant rights and responsibilities; and on addressing other issues that have, in the participant's past, resulted in housing crises or housing loss.
- Programs should refer households to community resources as appropriate.
- Case managers should make referrals to appropriate community and mainstream resources.

#### Appendix A Metro Denver CoC and ESG RRH Programs

#### **Emergency Solutions Grants Rapid Re-Housing Programs**

MDHI Emergency Solutions Grant RRH Denver Department of Human Services Emergency Solutions Grant RRH City of Aurora Emergency Solutions Grant RRH

#### Continuum of Care Rapid Re-Housing Programs

Aurora Mental Health Center, Aurora @ Home Boulder County Housing Authority Colorado Coalition for the Homeless, Consolidated RRH Denver Department of Human Services, Back Home RRH Family Tree, Home at Last Volunteers of America, Youth Transitions Project