

**DOCUMENT TITLE:** CoC Rapid Re-Housing Written Standards

**POLICY ADMINISTRATION:** The Greater Kansas City Coalition to End Homelessness, Jackson/Wyandotte County Continuum of Care Lead Agency

­­­**Policy Formation and Approval Process**

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| --- | --- | --- | --- | --- |
| Step | Responsible Party | Due Date | Date Completed | Link to Draft, Notes, etc. |
| Initial Draft | Policy and Procedure Coordinator | 5/26/2020 | 5/26/2020 | [Initial Draft](https://gkcceh.squarespace.com/s/Rapid-Re-Housing-Written-Standards-Draft-1.docx) |
| Draft Review | Community Standards Committee | 6/2/2020 | 6/2/2020 | [Notes](https://gkcceh.squarespace.com/s/Rapid-Re-Housing-Written-Standards-Draft-1-Notes.docx) |
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**ADOPTED DATE:** August 7, 2020

**INTRODUCTION**

It is the role of the Greater Kansas City Coalition to End Homelessness (GKCCEH), the Continuum of Care Lead Agency for Jackson and Wyandotte counties (CoC MO-604), to ensure that appropriate standards are in place to uphold best practices, particularly within CoC MO-604 Housing Programs (HP). These Rapid Re-Housing (RRH) Written Standards are in accordance with the CoC Interim Rule - 24 CFR 578, HUD’s “Rapid Re-Housing: ESG vs CoC”, and the National Alliance to End Homelessness’s “Core Components of Rapid Rehousing”. They apply to CoC Rapid Re-Housing Programs to ensure:

* Program accountability to individuals and families experiencing homelessness
* Program compliance with HUD regulations
* Consistent, equitable assistance across RRH programs
* Reduction of barriers to housing
* Long-term housing stabilization
* Adequate program staff competence and training, specific to the target population being served

Note:

Agencies must follow CoC MO-604 approved standards in their CoC Rapid Re-Housing Programs; agencies may establish firmer standards than those adopted by CoC MO-604 but may not supersede any CoC MO-604 standards. CoC MO-604 recommends that agencies strongly consider not placing further restrictions into agency standards for Rapid Re-Housing, to promote consistency across RRH programs and ensure equity for all households served by CoC MO-604.

**RAPID RE-HOUSING WRITTEN STANDARDS**

**PERSONNEL**

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

**CRITERIA**:

1. HP provides training to all paid and volunteer staff on both the policies and procedures employed by HP and on specific skill areas as determined by HP.
2. 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, including but not limited to: trauma informed care, strengths based case management, mental health first aid, cultural competency, and diversity training.
3. HP must use HMIS or a Comparable Database; all users must abide by the standard operating procedures found in the HMIS/Comparable Database Policies and Procedures manual provided by the HMIS/Comparable Database Lead Agency. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
4. 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.
5. HP operates under an affirmative action/civil rights compliance plan or letters of assurance.
6. Agency staff review current cases and individual service plans on a regular and consistent basis to ensure quality/coordinated services.

**CLIENT INTAKE PROCESS**

**STANDARD**: HP will be an active member in the Coordinated Entry System (CES). HP will have minimal entry requirements to ensure the most vulnerable of the population are being served. HP will assist participants in locating safe, affordable housing that meets participants’ needs in accordance with HP client intake practices and within CoC MO-604 guidelines for Rapid Re-Housing Programs.

**CRITERIA**:

1. All Program participants must meet the following program eligibility requirements:
	1. The household must meet either category 1, category 2 or category 4 of the homeless definition, set forth by HUD in 24 CFR 578.37 ([See Definitions](#Definitions)).
		1. Should HP need to use RRH as a “bridge” into another program, they must ensure the individual will qualify for the intended HP the individual will be transferred into.
			1. Specifically, HP cannot transfer someone who is category 2 upon entry of RRH into a Permanent Supportive Housing Program, as they would not be eligible based on PSH guidelines.
			2. Any “bridge” intended to occur must be documented in a participant’s file and include proof of their eligibility for the type of HP they will be transferred into.
			3. HP should also have a secondary housing plan in place for any individual who they intend to “bridge”, understanding that “bridge” may not be possible at the time an individual is needing to be relocated.
				1. “Bridging” an individual should be used if other options have been exhausted.
	2. HP must abide by all requirements noted in CES [Program Transfer Policies & Process](https://static1.squarespace.com/static/5db8636812643216dff9b6f4/t/5dc465737881f1730114067c/1573152116377/GKCCEH%2BParticipantTransfer%2BPolicy.pdf).
2. HP cannot disqualify an individual or family because of evictions or poor rental history, criminal history, credit history, lack of financial resources, or a history of domestic violence.
3. HP explains the services that are available and the expectations for participation. A copy of HP expectations and termination and grievance policies are given to the household prior to program entry.
4. HP will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies, required for HP to provide services. Program participants will be offered copies of all Releases of Information that they have signed. Participants have the right to refuse/revoke any Release of Information without penalty from any entity.

**PRIORITIZATION**

**STANDARD**: HP will prioritize eligible families and individuals that will receive Rapid Re-Housing assistance.

**CRITERIA**:

1. HP will prioritize each applicant household using the CoC MO-604 Coordinated Entry process, and any internal program priorities as set forth in the original or amended CoC MO-604 program application; examples of internal program prioritization include:
* Youth
* Families with Children
* Households fleeing domestic violence (fleeing is defined by the individual, not HP; see attached Domestic Violence and Homelessness definitions)
* Households with an individual having a mental health diagnosis
* Households with an individual having a substance use diagnosis
* Households with an individual diagnosed with HIV/AIDS
* Veteran households

**PROGRAM OPERATIONS**

**STANDARD**: HP will assist participants in locating and stabilizing in safe, affordable housing that meets participants’ needs.

**CRITERIA**:

1. In assisting in locating housing, HP considers the needs of the individual or family experiencing homelessness. Program participants may choose housing outside of the CoC MO-604’s geographic area, in CoC funded HP, if HP agency staff have the capacity to meet rent and service assistance requirements outlined in the CoC Interim Rule. (24 CFR 578.51(c)(4)
2. HP will assess potential housing for compliance with HUD Housing Quality Standards, lead based paint, and rent reasonableness standards (based on comparable units in the same zip code) prior to the participant signing a lease with the landlord.
3. HP provides assistance in accessing suitable housing through landlord engagement and housing search services.
4. HP may provide assistance in accordance with 24 CFR 578.51 and 578.53.
	1. Eligible Rental Assistance costs under 24 CFR 578.51 may include security deposits (up to 2 months), short and/or medium term tenant based rental assistance, last month’s rent (when paid with a deposit and 1st month’s rent), up to one month in vacancy payments, and up to one month’s rent in damages.
	2. Eligible Supportive Services assistance costs under 24 CFR 578.53 may include utility deposits, rental application fees, childcare, food, education services, case management, public transportation, housing & relocation services, credit repair, and legal services related to obtaining or retaining permanent housing.
	3. Ineligible costs under CoC Rapid Re-Housing Progams include:
		* Utility Payments for utilities not included in Tenant Based Rental Assistance (unless your grant otherwise stipulates)
		* Utility and/or Rental Arrears (unless your grant otherwise stipulates)
		* Operating Costs (cannot be combined with Rental Assistance)
5. HP participant must sign a legally binding written lease for a term of at least one year that is renewable (for a minimum term of one month), and terminable only for cause, with the landlord which must include a lease provision or addendum that includes all requirements that apply to tenants, the owner, or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking- See Emergency Transfer Policy and Lease Addendum for additional details).
6. HP staff and the participant should work together to develop a housing stabilization plan, which may include financial goals, periods and amounts of assistance, meeting schedules, employment goals, and a program exit strategy.
7. Assistance will be tailored to individual client needs in order to reach housing stabilization. This includes evaluating on an individual client basis the length of time rent and supportive services will be provided. CoC MO-604 recommends that HP adopt the 24-month standard set by HUD, to ensure long-term housing stability. However, if a program participant is required to sign a legally binding lease, HP are strong recommended to have the availability of funds to provide rental assistance for the length of the lease, should the participant be unable to cover the cost of rent with their own income.
8. CoC MO-604 does not require HP to require that program participants share in the cost of their rental assistance. If the agency requires rent cost sharing, the agency must have standards for client income contribution to rent. If an agency has income contribution standards they must apply to all program participants equally; for the purposes of calculating rent contributions, the rent shall equal the total monthly unit rent and, if the tenant pays separately for utilities, the monthly utility allowance set by the local Public Housing Authority. HUD regulations do not require clients to contribute any portion of income to rent when providing Rapid Re-Housing assistance. (24 CFR 578.37)
9. Individual case management is required at least monthly, except in the case of domestic and sexual violence programs. (24 CFR 578.37(F) Case management includes the following:
	1. Housing Stability Case Management assists participants in locating and obtaining suitable permanent housing, which may include:
		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 support and/or counseling
		6. Assessment of housing for compliance with CoC Interim Rule requirements for housing quality standards, lead- based paint, and rent reasonableness
		7. Assistance with submitting rental application
	2. Understanding leases
		1. Arranging for utilities.
		2. Making moving arrangements.
		3. Monthly documented contacts with RRH participants.
	3. 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:
		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 annual re-evaluations to determine on-going program eligibility and document lack of sufficient resources to retain housing with HP assistance (24 CFR 578.38(E)
		7. Other eligible services may be provided including:
			1. Legal Services to resolve a legal problem that prohibits a program participant from obtaining or retaining permanent housing, including:

Client intake

Preparation of cases for trial

Provision of legal advice

Representation at hearings

Counseling

Filing fees and other necessary court costs

* + - 1. Mediation between HP participant and the owner or person(s) with whom the participant is living.
			2. Credit Repair, including:

Credit counseling

Accessing a free personal credit report

Resolving personal credit problems

Other services needed to assist with critical skills related to household budgeting and money management

1. HP must re-evaluate the household for continued eligibility a minimum of every 12 months. To continue to receive Rapid Re-Housing assistance, the household must demonstrate:
	1. Lack of resources and support networks: the household must continue to lack sufficient resources and support networks to retain housing without program assistance.
	2. Need: HP must determine the amount and type of assistance that the household needs/wants to (re)gain stability in permanent housing.
2. Limitation on Case Management & Supportive Services

 a. Supportive services may be provided for no more than 6 months after rental assistance stops. (24 CFR 578.37(D)

**SERVICE COORDINATION**

**STANDARD**: HP may assist program participants, pursuant to 24 CFR 578.53, in attempting to obtain 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 and available 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 HP.
2. Other homeless and mainstream resources for which, if eligible, a client may 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; SNAP; Unemployment Insurance; Social Security benefits; Medicaid/Medicare.

**TERMINATION**

**STANDARD**: Termination is expected to be limited to only the most severe cases.

**CRITERIA:**

1. HP will adhere to CoC MO-604’s applicable termination, due process, and transfer policies ([Transfer Policy](https://static1.squarespace.com/static/5db8636812643216dff9b6f4/t/5dc465737881f1730114067c/1573152116377/GKCCEH%2BParticipantTransfer%2BPolicy.pdf); [Emergency Transfer Policy](https://www.gkcceh.org/s/GKCCEH-CoC-MO-604-Emergency-Transfer-Policy-Final-w-Forms.docx)).

**FOLLOW-UP SERVICES**

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

**CRITERIA**:

1. HP develops exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
2. It is recommended that a program attempt to follow up with phone or written contact at least once per month for six months after the client exits HP, having received their final month of rental assistance. A program may provide follow-up services that include identification of additional needs and referral to other agency or community resources to prevent future episodes of homelessness.
3. Participants may receive a maximum of 6 months of supportive services after the final rental assistance is provided to the household.

**CLIENT FILES**

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

**CRITERIA**:

1. The file maintained on each participant must, at a minimum, include information required by HUD and the funder, homeless documentation and backup, housing stabilization plans, and case notes.
2. Client information must be entered into HMIS or a Comparable Database (DV) in accordance with the data quality, timeliness and additional requirements found in the HMIS/Comparable Database Policies and Procedures manual provided by the HMIS Lead Agency.
3. HP 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.
4. All records pertaining to CoC MO-604 funds must be retained by CoC funded HP for 5 years after the expenditure of all funds from the grant under which HP participant was served. Copies made by digital scanning, photocopying, or similar methods may be substituted for the original records. Records pertaining to other funding sources must adhere to those record retention requirements.
5. Client files will be made available to CoC MO-604 lead agency during program monitoring visits. Participants have the right to authorize whether they agree to having their file audited or not. HP are responsible for documenting their client’s choice using a release of information or a signed document stating the client’s wish to have their file kept confidential.

**EVALUATION AND PLANNING:**

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

**CRITERIA**:

1. HP has written goals and objectives for its services to meet the outcomes required by HUD, the local Continuum of Care, and other funders, as outlined in HP’s original CoC application to HUD.
2. HP reviews the case management, housing, and follow-up needs of program participants and the existing services that are available to meet these needs. As appropriate, revisions to goals, objectives and activities are made based on program evaluation.
3. HP exhibits regard for participant privacy in conducting and reporting its evaluation.

**DEFINITIONS**

**Coordinated Entry**—a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs.

**Dating Violence**—violence committed by a person:

* Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
* Where the existence of such a relationship shall be determined based on a consideration of the following factors:
* The length of the relationship;
* The type of relationship; and
* The frequency of interaction between the persons involved in the relationship.

**Domestic Violence**—includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. The term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

**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. 24 CFR 5.403

**Homeless**—for the purposes of CoC funded Rapid Re-Housing, homelessness is defined under the [Final Homeless Definition](https://files.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf), with the following eligible Categories of Homelessness:

Category 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. 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;
2. 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);
3. 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;

Category 2) An individual or family will imminently lose their primary nighttime residence within 14 days, and no subsequent residence has been identified, and the household lacks the resources or support networks needed to obtain other permanent housing; or

Category 4) Any individual or family who is fleeing (fleeing is defined by the individual, not HP), or is attempting to flee [domestic violence](#DV), [dating violence](#Dating), [sexual assault](#SA), [stalking](#Stalking), or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; and has no other residence and lacks the resources or support networks, e.g., family friends, faith-based or other social networks, to obtain other permanent housing. *“Rapid Re-Housing: ESG vs CoC”,* HUD Exchange.

**Homeless Management information System (HMIS)**—the information system designated by the Continuum of Care to comply with HUD’s data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness. Domestic violence providers utilize a separate, comparable database in lieu of HMIS, to protect client data from sharing. (24 CFR 578.3)

**Housing First**—an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

**Rapid Re-Housing**—a program designed to help individuals and families exit homelessness as quickly as possible, move to permanent housing, and achieve stability in that housing. Rapid Re-housing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety), and the resources and services provided are typically tailored to the unique needs of the household. The core components of a rapid re-housing program are housing identification and relocation, short-and/or medium-term rental assistance (1-24 months), move-in (financial) assistance, and case management and housing stabilization services. In addition, Rapid Re-Housing may be utilized to serve as bridge housing to other permanent housing programs. In such cases, individuals and families considered chronically homeless at program entry maintain their chronically homeless status during the time that they are receiving Rapid Re-Housing assistance. 24 CFR 578.37 & “*Core Components of Rapid Re-Housing”,* National Alliance to End Homelessness.

**Sexual Assault**—any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

**Stalking**—engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for the person's individual safety or the safety of others; or
2. Suffer substantial emotional distress.