

APPENDIX E. VERMONT HOP/ESG STANDARDS OF PROVISION OF ASSISTANCE State Fiscal Year 2018

A. Evaluation of individuals' and families' eligibility for assistance under the Housing Opportunity Grant Program (HOP).

The policies and procedures of providers funded under HOP shall be consistent with the definition of homeless in 24 CFR 576.2 (included as Appendix A) and the recordkeeping requirements in 24 CFR 576.500(b), (c), (d), and (e), specifically:

Program participant eligibility for Emergency Shelter is limited to families and individuals who meet the criteria under paragraph (1), (2), (3), or (4) of the HUD Definition of Homelessness (Appendix A).

Program participant eligibility for Rapid Re-Housing activity is limited to families and individuals who meet the criteria under paragraph (1) of the HUD Definition of Homelessness (Appendix A), or who meet the criteria under paragraph (4) and live in an emergency shelter or other place described in paragraph (1) of the definition.

B. Admission, diversion, referral and discharge by emergency shelters and transitional housing programs.

Emergency Shelter and Transitional Housing Providers are required to provide written shelter standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence/sexual assault; and families who have the highest barriers to housing and are likely to be homeless the longest. Applicants must attach written standards that include policies and procedures that address shelter admission, diversion, referral and discharge. This includes policies related to involuntary and voluntary discharge, which will be reviewed by the Office of Economic Opportunity to ensure compliance with federal regulation standards.

If the shelter provides services to families with children under 18; the age of the child may not be used as a basis for denying family's admission.

C. Assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter.

Providers funded under the Emergency Shelter activity are required to have written policies and procedures regarding how residents' needs for essential services are determined and prioritized. All Emergency Shelter applicants must describe their standards in their application for funding.

- D. Determining and prioritizing which eligible families and individuals will receive rapid re-housing assistance; Determining what percentage, or amount, of rent and utilities costs each program participant must pay, if any, while receiving rapid re-housing assistance; AND Determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.***

Rapid Re-Housing:

To provide effective Rapid Re-housing services and assistance to as many homeless families as possible, including those with multiple housing barriers, priority will be given to those persons for whom it can be determined they would likely remain homeless but for this assistance.

Among eligible participants, Vermont has not chosen to prioritize sub-populations.

Non-Profit grantees providing such assistance must document and maintain household income information at the time of assistance. Eligibility and types/amounts of assistance must be re-evaluated not less than once annually for rapid re-housing assistance. Each re-evaluation must establish and document 1) that the participant does not have an annual income that exceeds 30% of median family income; and 2) the participant lacks sufficient resources and support networks necessary to retain housing without HOP assistance.

While the ability to sustain housing is a HOP program goal and performance measure, it will not be interpreted as a threshold requirement. Prioritization and determination of assistance should be based on household need at the time of initial intake and screening.

No financial assistance may be provided to a household for a purpose and time period supported by another public source.

Applicants must attach written standards for the following:

- 1) Determining and prioritizing which eligible families and individuals will receive rapid re-housing assistance;***
- 2) Determining what percentage, or amount, of rent and utilities costs each program participant must pay, if any, while receiving rapid re-housing assistance;***
- 3) Determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.***

Written standards may be developed in partnership with the local interagency or housing review team. Written standards must be applied consistently within the program and must conform to policies and procedures established under the Coordinated Entry System of the Continuum of Care, once implemented locally.

Grantees may modify their level of assistance below the maximums provided in this

document based on availability of HOP funds, or ability to leverage other state, federal or private assistance funding for clients.

Short-term rental assistance provided will be in the form of tenant-based rental assistance for up to three months. Medium-term rental assistance provided will be in the form of tenant-based rental assistance for more than three months and up to twenty-four months.

In the case of medium-term rental assistance, grantees are strongly encouraged to require participants to contribute a minimum of 30% of their household income towards housing costs.

- E. Determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receives assistance, or the maximum number of times the program participant may receive assistance.***

No grantee may, with respect to individuals or families occupying housing owned by the grantee or parent organization, determine eligibility, carryout assessment activities, or administer assistance.

Housing Stability Case Management

While providing rapid re-housing assistance, a participant must:

- Meet with a case manager not less than once per month to assist the participant in ensuring long-term housing stability;
- Develop a plan to assist the participant in retaining permanent housing after HOP assistance ends, taking into account participant's current and expected household budget, additional sources of assistance, and affordability of area housing.
- Programs are exempt from this case management requirement if prohibited under the federal Violence Against Women Act (VAWA) or Family Violence Prevention and Services Act from making shelter or housing conditional on the participant's acceptance of services.

Permitted Uses & Maximum Limits of HOP Financial Assistance & Rental Assistance:

- Payments for security deposits through HOP funds may not exceed the value of 2 months' rent.
- Moving costs, including truck rental.
- Utility deposits (standard deposits required by utility companies) and payments for arrears up to 3 months, unless available from another source. Eligible utility services are gas, fuel oil, water, sewage and electric.

- Excluding rental assistance, no participant may receive more than 9 months of HOP financial assistance in a 3-year period.
- Payments for rental arrears through HOP as a one-time payment may not exceed the value of 3 months' rent.
- Short-term tenant-based rental assistance for up to three months.
- Medium-term tenant-based rental assistance for more than three and up to twenty-four months.

Limitations to All HOP Financial Assistance & Rental Assistance:

- A written lease must be in place, and the applicant's name must be on the lease, before rental assistance or security deposits are made.
- Rental assistance cannot be provided if rent exceeds the Fair Market Rent established by HUD or does not meet the standard for rent reasonableness (24 CFR 982.507). This policy does not apply to rental arrears. Additional guidance is provided under separate memorandum.
- All payments must be third-party vendor payments; payments may not be made to relatives who are landlords.
- Payments are to be made on behalf of renters only; homeowners are not eligible for HOP assistance.
- No financial assistance may be provided to a household for a purpose and time period supported by another public source.
- Only in cases of rental assistance, the grantee will enter into a rental assistance agreement with the landlord. Landlords must agree to copy the provider on any eviction notice or complaint used to commence eviction; the provider must make timely payments to the owner according to the participant lease agreement.
- All rental assistance is tenant-based, the participant selects their own housing unit and may move to another unit or building and continue assistance so long as other requirements and eligibility are met.

Additional Requirements when Financial Assistance or Rental Assistance is used to help a participant move into a unit:

- 1) All housing must meet HUD habitability standards. When rental assistance under this program is greater than 3 months, housing must meet the AHS Housing Inspection (which includes the HUD ESG habitability standards) conducted by the Vermont State Housing Authority. In all other cases, grantees are not required to use the AHS Housing Inspection conducted by the Vermont State Housing Authority, but may do so if they choose. Unlike HQS inspections, a certified inspector is not needed to conduct HOP habitability inspections. Units assisted may be inspected by

program staff, or staff hired by the agency. Additional checklist and guidance is provided under a separate memorandum.

- 2) All housing constructed prior to 1978 must meet lead paint requirements. Additional guidance is provided under a separate memorandum.

F. Case Management Guidance:

Grantees using HOP funding to provide Case Management activities must understand and agree to the following special guidance.

***Clarifying Intake/Screening, Search & Placement,
and Housing Stability Case Management***

While acknowledging that case management should remain flexible to best serve the individual needs of households, the following defines basic expectations as to what is provided. This is preceded by a definition of Intake/Screening, another essential function for programs serving the homeless, and a description of Housing Search & Placement.

Intake/Screening: To provide coordination at the program or community level; and direct financial assistance where appropriate.

- Record basic household information to determine immediate need, and eligibility for other assistance.
- Assess if a household's needs can be met with financial assistance alone (such as back rent, security deposit), or if more intensive supports are required.
- Provide financial assistance where appropriate.
- Determine what initial referral may be appropriate (case management, shelter, etc.).
- Follow-up on initial referral to prevent a household from "falling through the cracks."

Housing Search & Placement: To provide logistical support and housing counseling to households preparing to move into permanent housing.

- Assess housing barriers, needs and preferences.
- Develop of an action plan for locating housing.
- Support housing search.
- Provide outreach and negotiation with landlords.
- Assist with rental applications and understanding leases.
- Assess housing habitability and rent reasonableness.

- Assist with obtaining utilities and making moving arrangements.
- Provide tenant counseling on rights and responsibilities.

Housing Case Management: *To provide coordination for the household; to provide more intensive interaction and services for clients deemed unlikely to resolve their housing crisis with short-term financial assistance alone.*

- Work closely with the household to acquire and maintain stable housing which is affordable to them.
- Determine (in consultation with household and other community partners, if applicable) who shall be the lead case manager for the household.
- Work with participants to develop a housing and service plan (including a path to permanent housing), set goals, and help participants stay on course.
- Provide ongoing risk assessment and safety planning with victims fleeing violence or make appropriate referral.
- Employ best practices to help the household identify its strengths and opportunities, as well as underlying issues which may have led to homelessness, or could undermine success if not addressed.
- Provide information, referrals and encouragement for the household (or members of the household) to avail themselves of other appropriate services or take appropriate action to address barriers.
- Assist with developing, securing and coordinating services and obtaining benefits.
- Monitor and evaluate client progress.
- Maintain a relationship with household, identifying the appropriate level of support without creating over-dependence. This includes providing post-lease, follow-up case management for higher-risk families after they have moved into permanent housing.

G. Other Guidance and restrictions on use of HOP funds:

Additional guidance on eligible and ineligible uses of HOP funds are contained in the Notice of Funding, grant agreements and guidance issued by the Office of Economic Opportunity. Grantees are encouraged to contact the Office of Economic Opportunity at (802) 798-2251 for clarification on any HOP requirements or standards.