



Atlanta Homeless Continuum-of-Care

RAPID RE-HOUSING

WRITTEN STANDARDS

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Introduction

In accordance with Title 24 of the Code of Federal Regulations (24 CFR) 91.220(l)(4)(i), 576, and 578, the City of Atlanta (City) and the Atlanta Homeless Continuum of Care (CoC) have developed the following written standards. These standards will apply to all projects that receive Atlanta Continuum of Care (CoC) and Emergency Solutions Grants (ESG) Rapid Re-Housing (RRH) funding and are intended as basic minimum standards to which ESG and CoC grantees can add additions and more stringent standards applicable to their own projects. In addition, all RRH projects must comply with the applicable Notice of Funding Availability (NOFA) under which the project was originally awarded.

The goal of these standards is to synthesize key elements of the HUD regulations with the processes and priorities of the CoC and ensure that the RRH program is administered fairly and methodically. The City and the CoC will continue to build upon and refine this document as the Rapid Re-Housing practice evolves to insure:

- Program accountability to individuals and families experiences homelessness.
- Program compliance with HUD, SSVF and CoC rules and guidance.
- Program uniformity and common client expectations.
- Adequate program staff competence and training, specific to the target population being served.
- Agencies have a guideline for which to model their individual program policies.
- All providers of Rapid Re-Housing assistance have a basis of knowledge of best practices, no matter the funding stream.

Rapid Re-Housing Overview

Rapid Re-Housing is housing created for the purpose of providing an immediate permanent housing situation for moderately vulnerable individuals. Common types of types of Rapid Re-Housing include HUD CoC Rapid Re-Housing for Families with Children, Emergency Solutions Grant funded Rapid Re-Housing (ESG), and Supportive Services for Veteran Families (SSVF).

Rapid Re-Housing projects have tremendous latitude in determining the type of population the project will serve, and a great degree of flexibility in how subsidies are applied, in duration and amount, to house and stabilize individuals and families.

Rapid Re-Housing should adopt a housing first philosophy, and projects in the Atlanta Continuum-of-Care are encouraged to do so. Furthermore, every Rapid Re-Housing project should be participating in the CoC Coordinated Entry process and the local prioritization of individuals for housing. In the Atlanta CoC, the Individual VI-SPDAT and Family VI-SPDAT assessment tools are utilized for prioritization and housing triage through the process of using acuity scores.

For additional guidance on the respective RRH Programs in the Atlanta CoC, please refer to:

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Rapid Re-Housing: ESG vs CoC (HUD Guidance):

https://www.hudexchange.info/resources/documents/Rapid_Re-Housing_ESG_vs_CoC.pdf

Coordination with Coordinated Entry

To ensure coordination of resources among grantees, Atlanta CoC utilizes the following approaches and procedures:

- **Participation in HMIS.** All grantees are required to participate in the Homeless Management Information System (HMIS) per the ESG and CoC Interim Rule (24 CFR 576 and 578). This helps avoid duplication of services and client data, and provides an opportunity to document homelessness.
- **Universal Assessment.** All families will be assessed using a comprehensive, universal assessment tool called the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) in order to make an informed and objective decision on the level of need of each family and streamline eligibility determinations.
- **Participation in CE.** All grantees will be required to receive referrals through Atlanta's Coordinated Entry process.

Target Population & Prioritization

Rapid Re-Housing programs administered through the Atlanta CoC target and prioritize homeless families and single persons who are most in need of this temporary assistance and are most likely to achieve and maintain stable housing, whether subsidized or unsubsidized, after the program concludes.

In providing rapid rehousing assistance, providers shall prioritize the following sub-populations:

- Families with children
- Domestic violence survivors;
- Single persons without long term disabilities; and
- Veterans, especially those persons who have served in the US military but are not eligible for services from the Department of Veterans Affairs (VA) or who are unable to access services from the VA.

Under the CoC two (2) types and depending on need, families and single persons are connected to either short-term or long-term rental assistance.

Short-Term Rental Assistance

Short-term rental assistance (up to 3 months) programs target families and single persons with low to moderate barriers to securing and retaining permanent housing. These families or single persons require minimal service intervention and limited financial assistance to secure and stabilize in permanent housing.

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Long-Term Rental Assistance

Long-term rental assistance (4-24 months) is targeted towards families or single persons who experience moderate to high barriers to securing and retaining housing. These families or single persons have multiple barriers to housing that require longer periods of time to resolve and may require more intensive service interventions.

Types of Eligibility

HUD CONTINUUM OF CARE RAPID RE-HOUSING: assistance to individuals and families defined as homeless under any of the four categories included in the Homeless Definition Final Rule:

- Literally homeless (Category 1) - An individual or family is defined as “literally homeless” if (1) living in a public or private place not meant for habitation, (2) living in temporary shelter, which includes congregate shelters and transitional housing, or (3) exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution.
- Imminently losing their primary night-time residence (Category 2)
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life threatening conditions (Category 4)

The CoC Program Notice of Funding Availability (NOFA) may impose additional eligibility requirements not reflected in the regulation. Projects funded to carry out RRH assistance under the CoC program must follow both CoC Program NOFA and regulatory requirements.

HUD ESG RAPID RE-HOUSING: an individual or family must demonstrate at initial evaluation that it is literally homeless (Category 1). RRH assistance is also available to people fleeing or attempting to flee domestic violence if they are also literal homeless (24 CFR part 576.104)

SUPPORTIVE SERVICES FOR VETERAN FAMILIES: 1. A member of a “Veteran family” who is either (a) a Veteran; or (b) a member of a family in which the head of household, or the spouse of the head of household, is a Veteran. (Note: The head of household should be identified by the Veteran family).

2. “Very low income”: Household income does not exceed 50% of the area median income. Unless VA announces otherwise in the NOFA, the median for the City of Atlanta was determined using the income limits most recently published by the Department of Housing and Urban Development for programs under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), which can be found at <http://www.huduser.org/portal/datasets/il.html>.

3. “Occupying Permanent Housing”: A very low income Veteran family is considered to be “occupying permanent housing” if they fall into one of three categories:

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- (1) Is residing in permanent housing;
- (2) Is homeless (also the HUD/HEARTH definition of homeless) and scheduled to become a resident of permanent housing within 90 days pending the location or development of housing suitable for permanent housing; or
- (3) Has exited permanent housing within the previous 90 days to seeks other housing that is responsive to the very low – income Veteran family’s needs and preferences.

Program Overview

Rapid Re-Housing grant funds may be used to provide short and/or long term rental assistance, case management, and accompanying supportive services, as needed, to help an individual or family that is homeless move as quickly as possible into permanent housing and achieve long-term stability in that housing.

Rental Assistance

Grantees may provide program participants with up to 24 consecutive months of rental assistance during any 3-year period. Assistance may include any combination of short-term rental assistance (up to 3 months) and medium-term rental assistance (more than 3 months but less than 24 months). Applicants can return for rental assistance if they have received less than 24 months of rent during any 3-year period on a case-by-case basis as a result of extenuating circumstances (e.g. illness, death, divorce). In addition, program participants may receive funds for security deposits in an amount not to exceed two (2) months of rent.

Program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and move to a different Continuum of Care geographic area if they move out of the assisted unit to protect their health and safety. See recordkeeping requirements to ensure proper documentation of imminent threat of harm.

Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other Federal, State, or local sources.

Amount of Rental Assistance

It is expected that the level of assistance will be based on the goal of providing only what is necessary for each household to achieve housing stability in the long-term. As such, Case Managers will determine the amount of rental assistance, which should not exceed the following guidelines:

- Grantees may provide up to 100% of the cost of rent to program participants

- The maximum share of rent a program participant may pay is 100%

Case Management Requirements

Program participants must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. Additional case management will be provided on a case-by-case basis based on demonstrated need. Case managers are required to facilitate a collaborative process of developing self-sufficiency plans to assist the program participants in retaining permanent housing after the assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses, other public or private assistance for which the program participant will be eligible and likely to receive, and the relative affordability of available housing in the City of Atlanta area.

CoC-RRH participants may receive case management assistance for no more than six months after rental assistance stops

For ESG-RRH participants, case management assistance may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the program participant is living in permanent housing.

Case management includes the following:

- A. Housing Stability Case Management assists participants in locating and obtaining suitable permanent housing, including:
 - a. Assessment of housing barriers, needs, and preferences
 - b. Development of an action plan for locating housing
 - c. Housing Search
 - d. Outreach to and negotiation with landlords
 - e. Tenant counseling
 - f. Assessment of housing compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness
 - g. Assistance with submitting rental applications
 - h. Understanding leases
 - i. Arranging for utilities
 - j. Making moving arrangements
- B. Ongoing Case Management services include assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for program participant who has obtained permanent housing through the Rapid Re-Housing program by:
 - a. Developing an individualized housing and service plan, including planning a path to permanent housing stability

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- b. Developing, securing, and coordinating services
 - c. Obtaining Federal, State, and local benefits
 - d. Monitoring and evaluating program participant progress
 - e. Providing information about and referrals to other providers
 - f. Conducting re-evaluations to determine on-going program eligibility
- C. Other Services may be provided, such as:
- a. Legal Services to resolve a legal problem that prohibits a program participant from obtaining or retaining permanent housing
 - b. Mediation between the program participant and the owner or person(s) with whom the participant is living
 - c. Credit Repair
- D. Case Management includes the following types of contact: home visits, office visits, meeting at a location in the community, or phone calls. Case management services should be guided by the use of the Full SPDAT assessment tools for families and individuals.
- E. 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.
- F. For ESG Rapid Re-Housing, at the 12-month (annual) recertification, the client's income must be at, or below, 30% AMI.

Supportive Services

Case managers will assist each program participant, as needed, to obtain appropriate supportive services, including assistance in obtaining permanent housing, medical and mental health treatment, counseling, and other services essential for achieving independent living.

Grant funds may be used to pay for eligible supportive services that address the specific needs of program participants. CoC Program participants may receive supportive services for no more than six months after rental assistance stops. ESG-RRH participants may not receive supportive services for more than 24 months during any 3-year period.

Other Federal, State, Local, and Private Assistance (ESG requirement)

ESG grantees must assist each program participant, as needed, to obtain other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:

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- Medicaid
- Supplemental Nutrition Assistance Program
- Women, Infants and Children (WIC)
- Federal-State Unemployment Insurance Program
- Social Security Disability Insurance
- Supplemental Security Income (SSI)
- Child and Adult Care Food Program
- Public housing programs
- Housing programs receiving tenant-based or project-based assistance
- Supportive Housing for Persons with Disabilities
- HOME Investment Partnerships Program
- Temporary Assistance for Needy Families (TANF)
- Health Center Program
- State Children's Health Insurance Program
- Mental Health and Substance Abuse Block Grants
- Services funded under the Workforce Investment Act

Recordkeeping Requirements

Grantees must establish and follow written intake procedures to ensure compliance with HUD's definition of homelessness and recordkeeping requirements.

Evidence of Homeless Status

The Atlanta CoC order of priority for establishing homeless status is:

A. Third-party documentation

Source documents provided by an outside source; or

Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations.

B. Staff/Intake worker observations

Documented by grantee staff (Observation of Homeless Status form, Appendix B)

C. Certification from the person seeking assistance

Grantee staff must certify efforts made to obtain third party documentation before allowing applicant to self-certify (Self-Declaration of Homeless Status form, Appendix B)

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Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

Individuals Residing in an Institution

For individuals residing in an institution (including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility) for fewer than 90 days, acceptable evidence includes:

- a. Discharge paperwork or a written or oral referral; or
From a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution that demonstrates the person resided there for less than 90 days. All oral statements must be recorded by the intake worker; **or**
- b. Certification from the person seeking assistance; and
Where the evidence above is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in the paragraph above and a certification by the individual seeking assistance that states that they are exiting or have just exited an institution where they resided for less than 90 days; **and**
- c. Evidence of literally homeless status prior to entry
Evidence that the individual was homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter, and was chronically homeless prior to entry into the institutional care facility (as defined in paragraph (1) of 25 CFR 578.3).

Annual Income

Grantees must demonstrate that the program participant household's annual income is less than or equal to 30 percent of the Area Median Income (AMI) as evidenced by the Income Eligibility Worksheet and supporting documentation. Eligible documentation (in order of preference) is as follows:

A. Source Documents

Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g. wage statement, unemployment compensation statement, public benefits statement, bank statement).

B. Third Party verification

A written statement by the relevant third party (e.g. employer, government benefits administrator) or the written certification by the grantee's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available.

C. Self-Certification

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If source documents and third-party verification are unobtainable, a written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

Program Requirements

Under CoC, ESG, and SSVF Interim rule, rental assistance is subject to additional requirements including rent reasonableness and Fair Market Rent (FMR) standards, housing standards, lease agreements and rental assistance agreements, and termination policies.

Rent Requirements

The key to rental assistance is ensuring long-term housing stability for the client, both for the duration of the program and upon exit. Thus, the purpose is to place participants into housing that will be sustainable in the long-term. As such, Atlanta program participants may pay no more than 60% of their income toward rent. In addition, case managers are expected to work with clients to review family budgets and ensure families can maintain their housing upon completion of the program.

Fair Market Rent (ESG Only)

Household rent for participants receiving ESG-funded rental assistance must not exceed the Fair Market Rent established by HUD.

FMR requirements do not apply when a program participant receives only financial assistance or services under HUD's Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of "last month's rent," utility payments/deposits, and/or moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

Rent Reasonableness

For participants receiving rental assistance, household rent must comply with HUD's standard of rent reasonableness meaning that the rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. These rent restrictions are intended to help ensure that program participants can remain in their housing after their assistance ends.

As with FMR, rent reasonableness requirements do not apply when a program participant receives only financial assistance or services under HUD's ESG Housing Stabilization and Relocation Services.

Termination

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and

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examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

- A. For **CoC RRH**, termination guidance is described in 24 CFR §578.91 of the HEARTH Continuum of Care Program Interim Rule as follows:
 - a. Termination of assistance. The recipient may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Termination under this section does not bar the recipient from providing further assistance at a later date to the same individual or family.
 - b. Due process. In terminating assistance to a program participant, the recipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:
 - 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 reasons 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.
- B. In terminating assistance to a program participant from ESG RRH, the agency must follow the due process provisions set forth in 24 CFR §576.402, as follows:
 - a. In general. If a program participant violates program requirements, the recipient may terminate the assistance in accordance with a formal process established by the recipient that recognizes the rights of individuals affected. The recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
 - b. Program participants receiving rental assistance or housing relocation and stabilization services. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:
 - i. Written notice to the program participant containing a clear statement of the reasons for termination;
 - ii. 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
 - iii. Prompt written notice of the final decision to the program participant.
 - c. Ability to provide further assistance. Termination under this section does not

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bar the recipient from providing further assistance at a later date to the same family or individual.

- C. Limitations on and continuations of the provision of supportive services to certain SSVF participants can be found under 38 CFR §62.35 under the Supportive Services for Veteran Families Regulations as follows:
- a. Extremely low income veteran families. A participant classified as an extremely low income veteran family will retain that designation as long as the participant continues to meet all other eligibility requirements.
 - b. Limitations on the provision of supportive services to participants classified under §62.11(c). (1) A grantee may provide supportive services to a participant classified under §62.11(c) until the earlier of the following dates:
 - i. The participant commences receipt of other housing services adequate to meet the participant's needs; or
 - ii. Ninety days from the date the participant exits permanent housing.(2) Supportive services provided to participants classified under §62.11(c) must be designed to support the participants in their choice to transition into housing that is responsive to their individual needs and preferences.
 - c. Continuation of supportive services to veteran family member(s). If a veteran becomes absent from a household or dies while other members of the veteran family are receiving supportive services, then such supportive services must continue for a grace period following the absence or death of the veteran. The grantee must establish a reasonable grace period for continued participation by the veteran's family member(s), but that period may not exceed 1 year from the date of absence or death of the veteran, subject to the requirements of paragraphs (a) and (b) of this section. The grantee must notify the veteran's family member(s) of the duration of the grace period.
 - d. Referral for other assistance. If a participant becomes ineligible to receive supportive services under this section, the grantee must provide the participant with information on other available programs or resources.
 - e. Families fleeing domestic violence. Notwithstanding the limitations in §62.34 concerning the maximum amount of assistance a family can receive during defined periods of time, a household may receive additional assistance if it otherwise qualifies for assistance under this Part and is fleeing from a domestic violence situation. A family may qualify for assistance even if the veteran is the aggressor or perpetrator of the domestic violence. Receipt of assistance under this provision resets the tolling period for the limitations on the maximum amount of support that can be provided in a given amount of time under §62.34.

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Environmental Review

Before any funds are committed, the City of Atlanta will conduct an environmental review of all CoC-funded grantee project site(s) to demonstrate there are no hazardous materials present that could affect the health and safety of the occupants. Environmental reviews will be conducted by the City of Atlanta and are acceptable for a 5-year time period. The costs of carrying out environmental review responsibilities are an eligible use of administrative funds.