

# Continuum<sup>Western VA 513</sup> of Care

## Virginia Homeless Solutions Program (VHSP) Policies and Procedures

Virginia Homeless Solutions Program (VHSP) is a Virginia Commonwealth funded program for the sheltering of homeless households, the prevention of homelessness, and the rapid rehousing of those who have become homeless. These services are provided through grant funding from the Department of Housing and Urban Development (HUD) and the Virginia Department of Housing and Community Development (DHCD); both of these entities require agencies receiving grant funding to be members of a Continuum of Care (CoC). The Western Virginia 513 Continuum of Care covers the Shenandoah Valley which includes: the Cities of Winchester and Harrisonburg, and the counties of Frederick, Clarke, Warren, Shenandoah, Page and Rockingham.

This program is designed to first divert households from homelessness, meaning explore other resources a household might have before issuing financial assistance and offer other assistance such as budgeting. Only use financial assistance when the household would be homeless; shelter may be the only immediate, short term solution.

The program goal is to provide effective and efficient assistance to prevent new cases of homelessness. It is intended to be administered as a community-based resource that maximizes mainstream resources and prevents shelter stays or shortens shelter stays through rapid rehousing. All grantees agree to participate in the Homeless Management and Information System (HMIS) database or a comparable database (for domestic violence service providers only), meet deadlines for submitting DHCD- and CoC-required reports, and meet data quality standards. All grantees will sign an MOU and agree to monitoring site visits as conducted by the Compliance and Evaluation Committee to ensure adherence to program guidelines.

VHSP will support the prevention of homelessness through funding of homeless diversion approaches. Diversion is a strategy that prevents homelessness for households seeking shelter by helping them identify an immediate alternative to homelessness and connecting them, if necessary, with services and financial assistance. Diversion improves community outcomes by reducing the number of households becoming homeless and thus reducing the demand for shelter beds.

\*\*All programs are to adhere to the housing first philosophy as mandated by HUD & DHCD.

## **Program Information:**

### **STREET OUTREACH**

**Street Outreach** includes essential services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services. Outreach efforts proactively seek all unsheltered people within the CoC geographic area, including people living in encampments or tent cities, and not be limited to serving only persons seeking assistance. All outreach should be person-centered and emphasize building rapport and trust as a means of helping people obtain housing with appropriate services. For more information, see the CoC's Street Outreach Policy.

The participant eligibility for street outreach is as follows:

- Unsheltered homeless, which includes individuals or families who lack a fixed, regular, and adequate nighttime residence, such as an individual or family with a primary nighttime residence that is a public or private place not meant for human habitation including but not limited to a car, park, abandoned building, bus or train station, airport, or camping ground.

Documentation to facilitate street outreach include:

- Homeless Certification Form
- Strength-based housing barrier assessment and housing plan
- Evidence of connection with the community's coordinated entry process
- Coordination with mainstream resources (as appropriate)

## **CENTRALIZED HOUSING INTAKE (CHI)**

**Centralized Housing Intake (CHI)** provides linkage to multiple housing services within the Shenandoah Valley to meet the needs of those facing homelessness and at-risk of homelessness due to a financial crisis. In an effort to expedite service delivery to consumers, the Western VA 513 CoC has a single point of entry (the Centralized Housing Intake) to assess their needs. For more information, see the CoC's Centralized Housing Intake Policy.

Centralized Housing Intake:

- Assures that all households at the entry point (when they are seeking shelter options) are assessed with a standardized assessment tool
- Seeks to ensure service providers refer appropriate households seeking shelter, and housing assistance to the centralized housing intake
- Coordinates consumer with an agency that will provide individualized housing-focused case management

\*\*Agencies in the CoC receiving referrals from Centralized Housing Intake respond within 5 business days.

## **SHELTER OPERATIONS**

**Shelter Operations** supports emergency shelter services for households experiencing homelessness. Shelters must meet basic habitability standards including fire inspection and Americans with Disabilities Act (ADA) standards. If the shelter itself is not ADA compliant the grantee must have a plan to meet the needs of households with disabilities (DHCD); the same applies to hotel/motel vouchers. Hotel/Motel Vouchers may be used if a shelter facility is not available. Vouchers are prioritized for households

that have secured permanent housing that will be available within two weeks. Case management supportive services must be offered based on need of the individual or household to address specific housing barriers.

Shelters will provide temporary stay to those who are eligible based on the following:

- A victim of domestic violence either individual, or household
- Literally homeless or at imminent risk of homelessness
- Individuals exiting institution (where they resided temporarily) with no resources or anywhere to go
- No other immediate solutions – diversion, prevention funds, or immediate rehousing/ options

Each agency staff is responsible for collecting the following information at intake which would include:

- Documentation of Homelessness (Third party letter or self-declaration signed by consumer if third party document is not possible).
- Determine reason for consumers need to request financial assistance through intake interview.
- Verification of any income (pay stubs, SSI/SSDI, or any award letter, bank statement, etc.) If consumer has no income, then a signed no income statement will be placed in file.
- The most recent bank statement to verify no financial resources.

The agency staff is responsible for providing information to the consumer regarding consumer's rights and responsibilities towards housing, and the resources available in the community to help meet the consumer's needs.

Forms to be completed and maintained in the consumers file include but are not limited to:

- Release of Information
- Phone Assessment & CHI Referral (Call Record/Email)
- VHSP Rapid Re-Housing Participant Eligibility
- Homeless Certification Form
- Documentation of Homelessness or Risk for Homelessness
- Motel/Hotel Vouchers Agreement
- Basic Habitability Inspection of Applicable Hotels/Motels
- Consumer Rights, Responsibilities & Procedures
- Notice of Program Termination Process
- Signed Receipt by Consumer of Denial/ Termination Policy with Appeals Process
- Completed HHS Intake Form and/or Computer Printout (Entry & Exit)

- Household's Annual (Gross) Income Calculation
- Verification of Income (Copies of Pay Stubs, Child Support Documentation/Subsidy Papers, SNAP Benefits)
- Income Limits Documentation
- Documentation of Financial Crisis (if applicable - Loss of job, medical bills, etc.)
- Housing Barriers Assessment
- Consumer's Housing Service Plan
- Case Notes
- Payment Records to Hotels/Motels

## TARGETED PREVENTION

**Targeted Prevention** is limited to those households who will imminently lose their primary residence and otherwise meet all other requirements for prevention including having household incomes below 30 percent Area Median Income. DHCD Program Participant Eligibility Requirements documentation must be included in each program participant file. The total period of financial assistance for prevention assistance is limited to 24 months within any three-year period except for case management services.

Homeless Prevention funds will provide rental assistance to those who are eligible based on all three of the following elements:

- At imminent risk of homelessness (10-15 days)
- Household income below 30 percent AMI with no more than \$500 in assets
- No other housing or financial resources, or support networks

Targeted Prevention agencies will provide rental assistance using a declining subsidy system that includes paying up to 100% of the client's security deposit and first month's rent. They will then determine how much is reasonable for the client to pay toward the second month based on the amount of income received prior to the rental due date. If a client has no income, agencies may ask that they pay \$25 toward the second month's rent to encourage ownership in the process. This changes to 25% of their rental amount at their first recertification.

\*However, at any time, in the presence of extenuating circumstances, agencies may deem it necessary to pay a larger/full rental portion for a household.

### **Procedure for Rental Payment**

1. Security Deposit and First Month's rent paid in full.
2. Calculate payment for second month based on the following:
  - If client(s) are housed **before the 15<sup>th</sup> of the month**, the client rent portion will be the full 30% of client(s) gross monthly income.

- If client(s) are housed **after the 15<sup>th</sup> of the month**, the client rent portion will be 15% of client(s) gross monthly income.
- If client(s) are housed in the **last week of the month**, agency will pay full rent for that following month; however,
  - Before paying full amount of rent for the following month, *review bank statements and/or savings from Resident accounts to determine if ANY portion should be paid by client.*

### **Recertification**

- **Income will only be evaluated at recertification** to determine what, if any, changes in rental payments or subsidies will take place.
- **No Income**
  - After 1<sup>st</sup> Recertification client pays 25% of their rent
  - After 2<sup>nd</sup> Recertification client pays 50% of their rent
- **Income**
  - After 1<sup>st</sup> Recertification client pays 40% of gross monthly income
  - After 2<sup>nd</sup> Recertification client pays 50% of gross monthly income

Each agency staff is responsible for collecting the following information at intake:

- Documentation of Homelessness (Third party letter or self-declaration signed by consumer if third party document is not possible.)
- Determine reason for consumers need to request financial assistance through intake interview.
- Verification of any income (Pay Stubs, SSI/SSDI, or any award letter, Bank Statement, etc.) If consumer has no income, then a signed no income statement will be placed in file.
- Most recent bank statement – verify no financial resources (if possible)

Prevention Recertification Eligibility:

- Consumer's household income below 30 percent area median income (AMI)
- The household lacks the financial resources and support networks needed to remain in existing housing without Targeted Prevention assistance.
- Housing stabilization services are being appropriately implemented (Consumer is actively participating in monthly case management).

\*\*\*Three-month recertification applies to prevention financial assistance. In cases where program consumers receive only case management services, recertification is required every 12 months. Please note that while case management is required at least monthly, additional participation in supportive services may not be required of program participants.

HUD sets median income levels for communities across the country; these numbers vary significantly. This data can be found at: <http://www.huduser.org/datasets/il.html>. All consumers' files must contain documentation that verifies the consumer's eligibility to receive prevention assistance. Extremely low-income individuals and their families are eligible to receive prevention assistance according to DHCD VHSP Guidelines.

"Extremely low income" means total household income of less than 30 percent of the median income for the area (Area Median Income or AMI), as defined by HUD. The entire household income must be taken into account (such as TANF, child support, earned income, SSI/SSDI, Social Security.). The number of persons living in the household applying for assistance must also be verified. A statement from the participant regarding household composition is acceptable documentation (Statement of Fraud Consequences should be included with form).

The case manager should have income verification for all adult members of a household. If an adult member of a household has no verifiable income, the case manager must have the person sign and date a No Income Statement (form) indicating that they have no income.

Income documentation should reflect current income for all household members. Income statements should be less than 90 days old from date of intake, based on the date of eligibility determination. Eligibility for recertification must be assessed every three months; consumer has the sole responsibility to report increases or decreases in income as they occur to case management for all those in household.

The Agency staff is responsible for providing information to the consumer's regarding consumer's rights and responsibilities towards housing, and the resources available in the community to help meet the consumer's needs.

The following forms will be completed and kept in the consumers' file:

- Release of Information
- Phone Assessment & CHI Referral (Call Record/Email)
- VHSP Prevention Participant Eligibility
- VHSP Recertification Form (if applicable)
- Homeless Certification Form
- Documentation of Risk for Homelessness

- Consumer Rights, Responsibilities & Procedures
- Notice of Program Termination Process
- Signed Receipt by Consumer of Denial/ Termination Policy with Appeals Process
- Completed HMIS Intake Assessment Computer Printout (Entry & Exit)
- Household's Annual (Gross) Income Calculation
- Verification of Income (Copies of Pay Stubs, Child Support Documentation/Subsidy Papers, SNAP Benefits)
- Income Limits Documentation
- Documentation of Financial Crisis (if applicable - Loss of job, medical bills, etc.)
- Housing Barriers Assessment
- Consumer Housing Service Plan
- VHSP Tenant-Landlord-Case Manager Communication Agreement
- Case Notes
- W9 for Payee
- Signed Lease
- DHCD VHSP Habitability Checklist (only needed for move-ins)
- Disclosure of Information on Lead-Based Paint (if unit was built prior to 1978/only needed for move-ins)
- Rental Assistance Agreement
- Rent Reasonableness Form
- Utility Allowance Form
- Fair Market Rent Limits
- Statement of Rent Owed/ Landlord Statement
- Payment Request/Record
- Exit Letters to Consumer (Exit Letter, Appeal Process, Reason for Exit, and Award Letter)
- Exit Letter to Landlord

\*\*Notice that rent arrears assistance is limited to 2 months.

## **RAPID RE-HOUSING (RRH)**

**Rapid Re-Housing (RRH)** is time-limited housing assistance for literally homeless households; who lack a fixed, regular, and adequate residence at intake. The amount of assistance varies per consumer depending on funds available, consumer need and program guidelines. This includes those who are currently literally homeless (shelter residents, living in other situations not meant for human habitation); and those exiting an institution (where they resided temporarily) with no housing resources. The total period of financial assistance for RRH is limited to 24 months within any three-year period. 24 month limit applies to case management as well.

Rapid re-housing providers will provide rental assistance using a declining subsidy system that includes paying up to 100% of the client's security deposit and first month's rent. They will then determine how much is reasonable for the client to pay toward the second month based on the amount of income received prior to the rental due date. If a client has no income, agencies may ask that they pay \$25 toward the second

month's rent to encourage ownership in the process. This changes to 25% of their rental amount at their first recertification.

\*However, at any time, in the presence of extenuating circumstances, agencies may deem it necessary to pay a larger/full rental portion for a household.

### **Procedure for Rental Payment**

1. Security Deposit and First Month's rent paid in full.
2. Calculate payment for second month based on the following:
  - If client(s) are housed **before the 15<sup>th</sup> of the month**, the client rent portion will be the full 30% of client(s) gross monthly income.
  - If client(s) are housed **after the 15<sup>th</sup> of the month**, the client rent portion will be 15% of client(s) gross monthly income.
  - If client(s) are housed in the **last week of the month**, agency will pay full rent for that following month; however,
    - Before paying full amount of rent for the following month, *review bank statements and/or savings from Resident accounts to determine if ANY portion should be paid by client.*

### **Recertification**

- **Income will only be evaluated at recertification** to determine what, if any, changes in rental payments or subsidies will take place.
- **No Income**
  - After 1<sup>st</sup> Recertification client pays 25% of their rent
  - After 2<sup>nd</sup> Recertification client pays 50% of their rent
- **Income**
  - After 1<sup>st</sup> Recertification client pays 40% of gross monthly income
  - After 2<sup>nd</sup> Recertification client pays 50% of gross monthly income

Three basic elements of initial RRH eligibility (at least one must apply):

- Literally homeless (shelter residents, living in other situations not meant for human habitation)
- Individuals exiting institutions (where they resided temporarily – 90 days or less) with no resources or anywhere to go
- No other housing or financial resources

\*\*Income eligibility is not required when households first access RRH because they are literally homeless; however, it is required when recertifying for continued eligibility for RRH financial assistance every 3 months following intake.

#### RRH Recertification eligibility:

- Household income below 30 percent Area Median Income (AMI) and less than \$500 in assets
- Household lacks the financial resources and support networks (family and friends) needed to remain in existing housing without RRH financial assistance
- Housing stabilization services are being appropriately implemented (Consumer is actively participating in monthly case management – documentation is shown by case notes.)

HUD sets median income levels for communities across the country; these numbers vary significantly. This data can be found at: <http://www.huduser.org/datasets/il.html>. All consumers' files must contain documentation that verifies the consumers' eligibility to receive RRH recertification assistance. Extremely low-income individuals and their families are eligible to receive RRH assistance.

"Extremely low income" means total household income (only include cash available income) of less than 30 percent of the median income for the area (Area Median Income or AMI), as defined by HUD. The entire household income must be taken into account (such as TANF, child support, earned income, SSI/SSDI, Social Security.) The number of persons living in the household applying for assistance must be verified. A statement from the consumers regarding household composition is acceptable documentation.

The case manager should have income verification for all adult members of a household (including any minor's income). If an adult member of a household has no verifiable income, the project sponsor must have the person sign and date a No Income Statement Form.

Income documentation should reflect current income. Income statements should be less than 90 days old, based on the date of eligibility determination. Eligibility for recertification must be assessed every three months. Consumer has the sole responsibility to report increases & decreases in income as they occur to case manager (CM).

During intake or recertification for RRH, the consumer will be informed verbally and in writing with a form of the established requirements and procedures for eligibility to receive financial assistance from the RRH Program managed by the agency. The consumer will be informed verbally they are not automatically approved for program assistance without a complete file review. All the documentation and paperwork needs to be collected for eligibility determination **before** any financial assistance can be provided.

Forms to be completed and maintained in the consumers file:

- Release of Information
- Phone Assessment & CHI Referral (Call Record/Email)
- VHSP Rapid Re-Housing Participant Eligibility
- VHSP Recertification Form (if applicable)
- Homeless Certification Form
- Documentation of Homelessness
- Consumer Rights, Responsibilities & Procedures
- Notice of Program Termination Process
- Signed Receipt by Consumer of Denial/ Termination Policy with Appeals Process
- Completed HMIS Intake Assessment Computer Printout (Entry & Exit)
- Household's Annual (Gross) Income Calculation
- Verification of Income (Copies of Pay Stubs, Child Support Documentation/Subsidy Papers, SNAP Benefits)
- Income Limits Documentation
- Documentation of Financial Crisis (if applicable - Loss of job, medical bills, etc.)
- Housing Barriers Assessment
- Consumer Housing Service Plan
- VHSP Tenant-Landlord-Case Manager Communication Agreement
- Case Notes
- W9 for Payee
- Signed Lease
- DHCD VHSP Habitability Checklist (only needed for move-ins)
- Disclosure of Information on Lead-Based Paint (if unit was built prior to 1978/only needed for move-ins)
- Rental Assistance Agreement
- Rent Reasonableness Form
- Utility Allowance Form
- Fair Market Rent Limits
- Statement of Rent Owed/ Landlord Statement
- Payment Request/Record
- Exit Letters to Consumer (Exit Letter, Appeal Process, Reason for Exit, and Award Letter)
- Exit Letter to Landlord

## **Housing Opportunities for Persons With AIDS (HOPWA)**

The Housing Opportunities for Persons With AIDS (HOPWA) program provides resources and incentives for meeting the housing needs of low-income persons with Acquired Immunodeficiency Syndrome (AIDS) and related diseases, and their families. Activities of primary importance are providing housing assistance and services that assist this population to maintain housing stability where they can maintain complex medication

regimens and address HIV/AIDS related problems. Grantees should partner with other service providers (public and private) to coordinate project participant services and fully leverage the available resources in the particular service area.

There are two basic elements of HOPWA eligibility:

- Household has at least one person who has Acquired Immunodeficiency Syndrome (AIDS) or related diseases (Human Immunodeficiency Virus, that is, HIV infection). This includes households where the only eligible person is a minor. Medical verification of status is required.
- The household must be at or below 80 percent of Area Median Income (AMI).

All participant files must contain documentation of an intake assessment that verifies the participants' eligibility to receive HOPWA assistance. Low-income people living with Acquired Immunodeficiency Syndrome (AIDS) or Human Immunodeficiency Virus (HIV) diagnosis and their families are eligible to receive HOPWA assistance.

Acceptable medical documentation of HIV status includes:

- A statement of HIV verification signed by a physician, certified health care worker, or HIV testing site representative;
- Social Security Administration records indicating the nature of a disability determination;
- Other relevant federal program records verifying HIV status.

### **VHSP funding does not cover:**

- Services related to unaccompanied minors who are not legally emancipated;
- Services for which Section 8 rental vouchers or other rental subsidies that cover fair market rent costs are being provided except for **rental and utility deposits**
- Any housing damages caused by the consumer
- Rental assistance to households without valid lease agreements
- Construction or rehabilitation
- Credit card bills or other consumer debt
- Car repair or other transportation costs
- Case Manager's travel costs-mileage is an acceptable expense under case management
- Food
- Medical or dental care and medicines
- Clothing and grooming
- Home furnishings
- Pet care
- Entertainment activities

- Work or education related materials
- Indirect costs
- Cash assistance to consumers.
- Development of discharge planning programs in mainstream institutions such as hospitals, jails, or prisons

**Each agency will provide their consumers with the agency’s policy & procedures regarding the following (All Programs);**

**Termination of Participation and Grievance Procedure: (All Programs)**

Staff shall terminate assistance provided through funding of any program's activities to clients who violate the program requirements. The termination must follow the process of the consumer’s rights based on the Grievance Procedure.

Consumers, who are determined to have not met the minimum requirements of this program or are terminated for violating program requirements, shall be notified in writing of the reason for termination or denial based on eligibility.

**Appeals Procedure:**

If a consumer is denied services or has services terminated, the reason for the denial or termination will be explained to them verbally and written in a clear statement that refers to policies and/or DHCD guidelines.

1. Each agency will follow their own appeal procedure in house if the consumer is unsatisfied.
2. If the consumer continues to be dissatisfied, a written appeal may be written to the Executive Committee of the Western VA 513 Continuum of Care. A reply will be made within 10 days.

\*\*Domestic Violence Shelter are excluded from step 2 of this appeal process due to conflict with other funding sources.

Send appeal letter to:

CoC Executive Committee  
 Harrisonburg Housing Authority  
 P.O. Box 1071  
 Harrisonburg, Virginia 22803

3. In both instances, the appeals process ends with the final decision of Western VA 513 Continuum of Care. These decisions are based on guidelines and policies.

## **Privacy Policy:**

It is the policy of Western VA513 Continuum of Care to ensure that the privacy rights of the individuals who come to us for assistance are protected.

Therefore, no disclosure of any personal information contained in the records will be shared unless the consumer authorizes this and signs the proper forms.

Consumers' files and records shall be secured, when not in use, in a locked file cabinet. Consumers' records and files that are stored electronically shall be password protected and shall only be accessed by authorized agency personnel. Unique consumer identifiers shall be used on exterior label of all consumer files.

All consumers who complete applications must sign a HMIS Authorization for the Release of Information/Privacy Act Notice. This notice shall be verbally reviewed with consumer to explain the purpose of the request.

## **Conflicts of Interest:**

CoC policies must ensure against conflicts of interest.

No agency, employee, officer or agent shall participate directly or indirectly in the eligibility determination of a consumer of any program, if **conflict exists**. These policies will ensure that no agency, employee, officer or agent has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds hereunder, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

## **Nondiscrimination and Equal Opportunity Requirements:**

Western VA 513 Continuum of Care agencies do not discriminate or exclude services to any person based on race, color, religion, sex, age, national origin, familial status or disability and operates in accordance with the Federal Fair Housing Law, Equal Housing Opportunity.

**There are no charges or participation fees to program consumers**