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Indiana Balance of State CoC HUD CoC Training

PARTICIPATION REQUIREMENTS

Are You
Eligible?

Maybe

Yes

No

Participant Eligibility

Overview of Homeless Definition

HUD Category	Type	General Eligibility Guidelines*
Category 1	Literally Homeless	Eligible for PSH, RRH, TH. Joint TH/RRH
Category 2	Imminent Risk of Homelessness	Eligible for TH, Joint TH/RRH, RRH
Category 3	Homeless Under other Federal Statutes	Not eligible for any CoC Program assistance – without prior HUD approval
Category 4	Experiencing trauma from, lack of safety related to, Fleeing/Attempting to Flee Domestic Violence	Eligible for TH, RRH, PSH, Joint TH/RRH – DV Bonus Projects

*Note: important details are contained in following slides – eligibility limits may apply in certain circumstances

Chronic Homelessness

To meet HUD's definition of "chronically homeless," an individual must both:

1. Have a disability

- Including one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, PTSD, cognitive impairments from brain injury, and chronic physical illness or disability.

2. Have been homeless and living in a place not meant for human habitation, a safe haven or an emergency shelter

- For at least 12 months
- Or four separate episodes of homelessness that equal at least 12 months, with episodes separated by breaks in homelessness of at least 7 days.
- Stays in institutions for fewer than 90 days do not constitute a 'break' in homelessness provided the individual was homeless prior to the institution

HUD Chronic Homelessness Definition – Continued

- ✓ People residing in an institution <90 days AND who were literally homeless (unsheltered, ES, SH only) immediately before entering also qualify (time in institution counts toward 12 months).
- ✓ Families with an adult or minor HoH who meet all criteria above also qualify.
- ✓ RRH participants retain their CH status [if CH at time of program entry] Time in RRH does not count toward CH
- ✓ Occasion is demarcated by a break of 7 or more consecutive nights not residing in a place not meant for human habitation, in shelter, or in a safe haven.
- ✓ Continuous means without a break of 7 or more consecutive nights.
- ✓ Third-party documentation of a single encounter is sufficient to consider an individual homeless for the entire month unless there is evidence of a break (e.g., an encounter in 5/1/16 counts for 5/1/16-5/31/16)

Definition of Disability

- Physical, mental or emotional impairment – includes impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury
 - Is expected to be long-continuing or of indefinite duration
- **AND**
- Substantially impedes the person's ability to live independently
- **AND**
- Could be improved by more suitable housing
- Developmental Disability
- HIV/AIDS



Documentation of Disability

Written verification from licensed professional

- Must be within scope of license to diagnose and treat disability
- Certification that disability meets HUD's definition

Determination of Disability by Social Security Administration

- Written verification or award letter
- Receipt of disability payment (SSI/SSDI)

Determination of Disability by VA

- Written correspondence from VA or receipt of VA disability payment

Intake staff-recorded observation of disability; no later than 45 days from application for assistance, confirmed by documentation above

DedicatedPLUS?

Expanded eligibility category for Permanent Supportive Housing

People qualify who:

- Meet Chronic Homeless Definition
- Reside in TH project being eliminated and met CH definition prior to entry
- Were homeless, were admitted to a PH project, were unable to maintain housing, and were CH prior to PH placement all within 12 months of intake into the DedicatedPLUS project.
- Residing in TH component of joint TH/RRH and were CH at entry
- Been homeless for at least 12 months in last 3 years but had not done so on 4 separate occasions
- Receiving assistance from VA homeless program and met one of above criteria prior to VA program entry

Documenting Homelessness – Written Intake Procedures



Must maintain & follow written procedures:

Require intake staff to document

- At intake, screening for eligibility for ALL persons seeking assistance
- Evidence relied upon to establish and verify homeless status



Include standards for documenting due diligence



Standards must be consistent with HUD's recordkeeping requirements



Documenting Homelessness – Written Intake Procedures

Standards
must
establish
order of
priority
for
obtaining
evidence
as:

- **Third-party documentation**, examples:
 - Letter from a shelter
 - Letter from an outreach team
 - Letter from another “service provider”
 - HMIS record
- **Staff member of grantee’s observation of the conditions where the individual was living**
- **Self-certification**
 - must be accompanied by intake worker’s documentation of the living situation and steps taken to obtain third-party documentation (limits apply)



What can be self-certified?

CAN BE SELF – CERTIFIED

Up to 3 months of homelessness for all clients

‘Breaks’ in homelessness for chronic status

Other factors can be self-certified for up to 180 days as documents are gathered

Self-certifications must be accompanied by documentation of attempts to secure third part documentation.

CAN NOT BE SELF CERTIFIED

Disability

More than 3 months of homelessness

- No more than 25% of the participants in a given program year can self-certify more than 3 months

Eligibility by Program Component – Referrals from Coordinated Entry

Permanent Supportive Housing

- Must be Homeless Category 1 and disabled
- Chronic Homeless or “Dedicated PLUS”

Rapid Rehousing

- Homeless Category 1, 2, or 4 [1 and 4 prioritized]

Joint Transitional/Rapid Rehousing

- Homeless Category 1, 2, or 4 [1 and 4 prioritized]

DV Bonus Projects

- Category 4 homeless only
- Rapid Rehousing
- Joint TH/Rapid Rehousing

Must be consistent with Housing First

Must provide participants with formal due process:

1. Prior to program entry provide written copy of program rules
2. Provide written notice of termination specifying program rules not followed
3. Provide an opportunity to appeal decision
 - May have representation
 - Decision made by person superior to who made initial decision
4. Prompt, written notice of final decision

Termination of Assistance

Program Exit Vs. Termination

Exit

- Participant is no longer eligible for or no longer requires assistance and CoC assistance has ended

Termination

- Participant has violated program requirements and recipient terminates assistance
 - Should only occur in most severe circumstances
 - Due process must be followed

Termination is not the same as eviction

- A participant may be evicted from a dwelling unit but retain eligibility for CoC program assistance

Poll: Who can be served in Permanent Supportive Housing



Only families with minor children



Households with incomes below 30%
of the Area Median Income



Households that meet HUD's definition
of chronic homeless or DedicatedPLUS



Families with designated service
animals



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Subsidy Requirements

INCOME DETERMINATION/SUBSIDY CALCULATION

Income Review
and
Documentation

Must examine income **at admission** and **annually** at a minimum

Must include **all household members**

Must **adjust subsidy** when changes are reported by participant

Participants must **provide income information** as a condition of participation

Income Determination

Participants receiving CoC Rental Assistance **must pay rent – leasing or operating may charge rent not to exceed:**

- Maximum rent payment is **30% of adjusted income or 10% of gross**, whichever is higher
- Participants with zero income are NOT required to pay a minimum rent but may be required to attest to having no income
- Participant must NOT be charged anything except for rent payment

Providers should obtain **third party verification of income**, whenever possible

- Pay stubs, copies of benefit checks, award letters, bank statements
- Order for verification: third party written document, verbal confirmation by third party, self-certification

What is considered income?

All income to all family members

- Employment (wages, salary, overtime, tips, commissions, bonuses)
- Social security, pensions, disability
- Unemployment, workers compensation, severance
- Welfare assistance
- Alimony and child support
- Regular gifts
- Net income from business/profession

Income Calculations

Only Allowable Income Deductions

- Elderly/Disabled Household: **\$400/year**
- Dependents: **\$480 per dependent/year**
- For elderly/disabled households: **Medical expenses and disability assistance** in excess of 3% of gross income
- **Reasonable costs of childcare** to promote work or education



Typically excluded from income:

- Employment income for children under 18* (Benefit income is counted)
- Temporary, non-recurring or sporadic income/gifts
- Payments for care of foster children
- Lump sum additions to assets (inheritance, insurance, lottery)
- Medical expense reimbursement
- Income of live-in aide
- Student financial aid

* Note: The earned income of a full-time student 18 years old or older who is a dependent is excluded to the extent that it exceeds \$480.

Assets

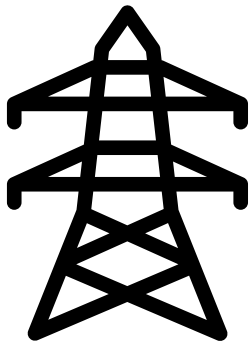
Up to \$5,000

- Does not impact tenant rent

Greater than \$5,000

- Income from assets based on passbook savings rate .6%
 - $(0.06 * \text{Amount of asset})$
- Ex.: Savings account of \$50,000 would generate **income** of \$300/year

Paying for Utilities



When a participant is responsible for paying utilities:

- Costs must be incorporated into the occupancy charges or rent charged to participant
 - If they exceed the participant's required rent payment, the participant must be reimbursed for the excess costs
- Calculate participant's rent contribution
 1. Determine reasonable utility costs based on PHA's utility allowance
 2. If participant is responsible for utilities, subtract utility allowance from tenant rent contribution, if the result is a negative number, that is the amount to reimburse the participant

POLL – Income Deductions

When calculating income for residents in **permanent supportive housing** what deduction should be applied to **all** households

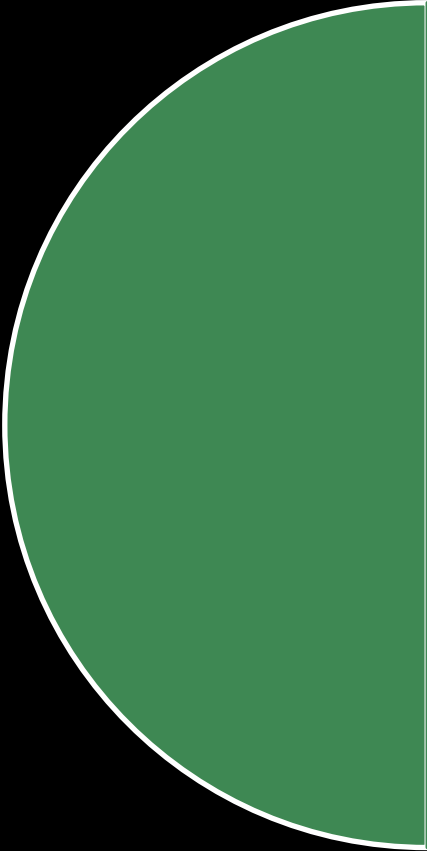
1) \$480 for having at least one dependent

2) \$50 for receiving SNAP benefits

3) \$400 for elderly/disabled household

4) \$125 earned income credit

Rapid Rehousing



Rapid Rehousing is not subject to occupancy charge and rent requirements (24 CFR 578.77) – instead RRH must follow CoC's written standards. CoCs have broad discretion as to what RRH participants will be required to pay.

Rapid
Rehousing
Program
Standards

In **RRH**, rent cannot exceed the reasonable rent.

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graph TD; A[In RRH, rent cannot exceed the reasonable rent.] --> B[Program can pay up to 24 months of rental assistance. Assistance can be tapered down after first 3 months.]; B --> C[Provide the least amount of subsidy needed to safely and stably end homelessness];
```

Program can pay up to **24 months of rental assistance**. Assistance can be tapered down after first 3 months.

Provide the least amount of subsidy needed to safely and stably end homelessness

Prioritizes housing stability

Goal is for household to be able to afford full rent without subsidy

Program staff should frequently evaluate continued need for assistance and periodically review with supervisors

In no event can housing subsidies exceed 24 months

Supportive services (for up to six months) can be provided even if financial assistance is no longer required

Progressive Engagement with RRH

Permanent Supportive Housing (PSH) Program Standards

Participants must have **documentation on file** regarding disability, homeless, and chronic homeless status.

All PSH projects must follow **Housing First**.

All PSH beds must either be dedicated to **chronically homeless** or the **DedicatedPLUS** populations.

All referrals must be from CA – based on a HUD approved **order of priority**.



Questions/Discussion

THANK YOU FOR PARTICIPATING