

DESCRIPTION OF THE YORK COUNTY CoC RRH RA PROGRAM

Rental Assistance. The York County Continuum of Care program, funded through the U. S. Department of Housing and Urban Development (HUD), includes two types of Rental Assistance programs approved by HUD. Both are for individuals and families who are homeless in order rapidly house and stabilize them in a permanent housing situation as quickly as possible, and to provide wrap-around supportive services after the family or individual obtains housing. The first type is called Short Term Rapid Re-housing which provides rental assistance and supportive services to an eligible program participant for a maximum of 3 months. The second type is called Medium Term Rapid Re-housing which is for homeless individuals and families in need of longer term assistance, and which provides assistance for a minimum of 4 months to a maximum of 24 months.

Program parameters are established by the Interim Rule (24 FR part 578), the York City and County Continuum of Care Committee, and the approved CoC application to HUD, as modified in the grant Applicant Technical Submission, and current HUD grant agreement(s) with the County.

Who is eligible? Individuals and families who are homeless:

An individual or family who is:

1. "Literally Homeless" 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. Fleeing domestic violence;
3. 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); or
4. 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

Who is NOT eligible? Individuals and families who are:

Not homeless.

What type of housing is eligible?

1. Unit for which the program participant and landlord will enter into a legally binding, written lease.
2. Unit for which the rent does not exceed the rent reasonableness amount documented by Agency in 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 (known as "Rent Reasonableness").
3. For units to be occupied children under age six or pregnant women, units compliant with Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act and implementing regulations in 24 CFR part 35 subparts A, B, H, J, K, M, and R
4. Meets HUD Housing Quality Standards.
5. Housing located within the City of York or County of York.
6. Housing with one bedroom per 2 persons in household.

What does the program provide?

1. Rental assistance for up to three (3) months duration (short term), or a minimum of four (4) months to a maximum of twenty-four (24) months (medium term).
2. Selection of short term or medium term of assistance, and monthly amount of rental assistance to be provided based on the client's case manager's determination of the client's ability to pay and may be provided on a declining scale over the duration of the provision of assistance, as determined by case manager and approved by supervisor.
3. Initial evaluation and housing stability plan, monthly case manager meetings, and case management services connecting program participant with community services in order to implement housing stability plan.
4. Rental assistance may be used to relocate to a different unit.

Procedures

York County's CoC program funded rental assistance programs are designed to help those who are homeless transition into permanent housing and continue residing in that housing, as needed, up to 3 months (short term) or 24 months (medium term). The primary goal of the program is to stabilize a program participant in permanent housing as **quickly as possible** and to provide wrap-around services after the family or individual obtains housing. Agencies administering the rapid re-housing programs should rely heavily on a case management plan to ensure long term stability. Agencies are expected to design an individual housing stability plan and assist program participants in plan implementation, which may include connection to mainstream or other resources, increase household incomes and/or improve access to mainstream benefits.

HUD CoC regulations at 24 CFR 578 describe the rapid rehousing programs, the supportive services requirements in § 576.53, the short- and medium term rental assistance requirements in § 578.51, and recordkeeping and documentation in 578.102.

Policies and procedures and forms developed by agency staff must be forwarded to YCPC Community Development Department staff for approval prior to implementation.

Step 1. Initial contact with Applicant.

1. Coordinated entry referral
2. telephone or drop in applicants. (see phone intake form to initially document housing status and whether or not homeless or at-risk-of-homelessness)
3. shelter residents referred by shelter case manager (while at shelter, considered homeless)
4. determine whether children are present in the household, as families with children have preference to CoC Rapid Re-housing rental assistance.

Step 2. Determination of Applicant Housing Status.

Initial Evaluation. An initial consultation between CoC program applicant and case manager is required.

Documentation with an intake form signed by the applicant and initialed by the case manager is required. The consultation will include:

1. Determination, verification and documentation of homelessness status;
2. OR, determination and documentation of applicant status as not meeting CoC homeless definition;
3. Determination and documentation of applicant's barriers to housing stability and initial plan to achieve stability;
4. Documentation of HMIS universal data elements;
5. Documentation of income of individual, family (family means related by marriage or blood), and household (household means persons living at one address, may include more than one individual, families and combinations thereof; and
6. Documentation of identification of all persons.

Verification of Housing Status

1. Document evidence provided by coordinated entry, applicant, shelter, or agency staff and verify through one or more of the following means, listed in order of preference:
 - o third party documentation. If available, this is the preferred evidence, (ex. letter from shelter, eviction notice from District Justice);
 - o documented agency staff observation of homeless condition; or
 - o self-declaration form signed and dated by applicant.
2. Check HMIS to determine if the applicant is currently receiving assistance from any other federal funding sources. A printed HMIS screen can be used as documentation in the applicant's file.
3. When applicable, verify evidence that client is fleeing domestic violence and has insufficient support networks.
4. Provide applicant with 10 days to provide necessary verification. If applicant fails to provide evidence, perform and document agency staff's due diligence to contact applicant and the reason for the delay before any action is taken.

Step 3. Determination of Applicant Income

Verification of Income.

1. Document the gross income of every individual and family member in the household for a minimum of the last 30 days, 90 days preferred (usually requested on intake form). Monthly income is used to calculate how much the applicant can pay for rent.
2. Total gross income by identifying all amounts and sources received by, or on behalf of, the individuals and families in the household: employment, child support, SSI/SSD, unemployment, pension, etc.
3. Verify by obtaining pay stubs, child support letter, SSI letter, bank statement showing electronic deposits, etc., from all the sources of income for the individuals and families in the household. In cases where evidence is not available, obtain source contact information and verify from source directly, and document verification attempts and results. Include verification documentation in applicant file.
4. Provide applicant with 10 days to provide necessary verification. If applicant fails to provide documentation, perform and document agency staff's due diligence to contact applicant and the reason for the delay before any action is taken.

Calculation of Income.

1. Calculate monthly and annual income for one person households (individuals) or for a family, or for all families/individuals living together in a household. Add up the individual and/or family incomes to obtain the household income. Income calculations are modeled after the requirements for the HOME Investment Partnerships program (24 CFR 92.508) and other HUD regulations. Guidance is located here: http://portal.hud.gov/hudportal/documents/huddoc?id=19754_1780.pdf
2. **Sample Calculations** for individuals or by family based on verified income amounts. The complete formula calculation will be completed on an income sheet summary (see attached).

Examples of different scenarios for income calculations:

- o If the individual or family member receives monthly income (ex. child support, SSI, pension) the monthly gross amount will be multiplied by twelve: Child support \$250 a month + SSI/\$200.00 a month = \$450 a month x 12 months a year = \$5,400 yearly income
- o If the individual/family just began working less than 30 days and have no paystubs available yet, the calculation will go as follows: Verification of Employment (VOE) documents as verification. (Example: \$10.00 an hour x 35 hours = \$350 a week x 52 week a year = \$18,200)
- o If individual/family has been working before applying to the program, with at least 30 days of income:
Week # 1 1/1/2016 – gross pay \$400.00
Week # 2 1/7/2016 – gross pay \$380.00
Week # 3 1/14/2016 – gross pay \$200.00
Week # 4 1/21/2016 – gross pay \$400.00
Total of all pay stubs provided \$1380.00 gross monthly income divided by 4 weeks = \$ 345.00
average per week x 52 weeks a year = \$ 17,940 /12 months = the average monthly amount for this client is \$1,495.00.

Step 4. Determination of Eligible Housing Unit for Applicant.

1. Address must be located in York City or York County
2. Condition. Minimum HQS standards per 24 CFR part 578.75 b.
Verify that unit meets standards:
 - o Agency must conduct a physical inspection of potential unit
 - o Document that the potential housing unit is in compliance with State and local housing codes, licensing requirements, and any other requirements of the municipality it is located within
 - o owners of units not meeting HQS shall have 30 days from the date that the inspection is conducted to make corrections and no assistance shall be provided for that unit until all corrections are made, and agency re-inspects the unit and verifies that the unit meets HQS
 - o Agency must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS
 - o each dwelling unit must have at least one bedroom or living/sleeping room for each two persons

- children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room
 - if household composition changes during the term of assistance, household may be relocated to a more appropriately sized unit
3. Lead Based Paint
Verify units housing children under age of six, or a woman who could become pregnant do not have lead paint hazards. Childhood lead poisoning is a major environmental health problem in the United States, especially for low-income families in poor living conditions. If not detected early, children with high levels of lead in their bodies can suffer from damage to the brain and nervous system, behavioral and learning problems (such as hyperactivity), slowed growth, hearing problems, and headaches. Agencies that receive funds for Rapid Re-Housing MUST comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821–4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851–4856), and implementing regulations in 24 CFR part 35, subparts A, B, K, and R apply.
- Complete the “Lead Screening Worksheet” form. Contact the Chief, Community Development Department, York County Planning Commission if you require further assistance.
4. Lease. Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit. The lease must be between the owner and the program participant. Executed copy must be in the file.
Verify landlord
- Document owner of property, and identity of authorized rental agent
5. Rent Reasonableness.
Verify rent reasonableness
- Obtain rent amount and rents currently being charged by the owner for comparable unassisted units. Assisted unit rent must be comparable to unassisted unit rents.
 - Obtain rent amounts for comparable units in the private unassisted market. Other local resources may be used to obtain information, e.g.: market surveys, classified ads, information from real estate agents. Make copies for the file. Assisted unit rent must not be in excess of unassisted units’ rents.
 - Document on Rent Reasonableness chart (included)
6. Property Owner/Agent Rental Assistance Agreement. Agency may make rental assistance payments only to an owner with whom they have entered into a Property Owner/Agent Rental Assistance Agreement. The Agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement:
- the Owner/Agent must give the Agency a copy of any notice given to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant;
 - Agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant’s lease;
 - Agreement with the Owner/Agent must terminate and no further rental assistance payments under that agreement can be made if:
 - The program participant moves out of the housing unit for which the program participant has a lease;
 - The lease terminates and is not renewed; or
 - The program participant becomes ineligible to receive CoC rental assistance.

Step 5. Identify Applicant as Eligible or Ineligible and Enter into HMIS System.

1. Once Determination of Housing Status, Determination of Income, and Determination of Eligible Housing Unit are verified and documented, the agency staff will make a determination of eligibility for CoC program assistance.
 Applicant will be notified of decision.
- If approved, applicant will be provided with the written decision and a

- Written description of the assistance to be provided, AND
 - The Agency and applicant responsibilities for participation in either the CoC funded short-term or medium-term rental assistance program.
 - If not approved, the applicant will be provided with the written decision and the reasons why they were not approved and the process for appeal.
2. Applicant chooses to accept assistance and participate in the program.
 - Agency staff will connect program participant with case management services in order to develop implementation plan for achieving housing stability per initial evaluation.
 3. Data entry of eligible applicants and program participants into County Homeless Management Information System (HMIS), the system used to collect data, develop reports, and ensure compliance.
 - Agencies must prepare and submit their policy and procedures as to how, who, and when data is being entered into HMIS.
 - record required HMIS data in the Pathways COMPASS system for all program participants.
 4. Staff time and agency operating costs that are expended *assisting* both eligible applicants *and* program participants is eligible for reimbursement through CoC rental assistance funding. Staff time and agency operating costs that are expended *supervising* these staff are eligible for reimbursement through CoC program administration funding.

Step 6. Determination and Payment of Rental Assistance

1. Program participant proposes a unit, or Agency provides program participant with list of eligible units
2. Determine amount of rental assistance necessary for selected unit:
 - a. Each program participant must pay a contribution toward rent in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 U.S.C. 1437a(a)(1)).
 - b. Income of program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).
 - c. Agency staff must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.
3. Agency staff determine length of time that assistance will be needed and select which program best suits needs of program participant: Short-term – 1 to 3 months of assistance or Medium-term – 4 to 24 months of assistance.
 - a. Agency is required to prepare a policy and procedure guide for establishing amount of CoC assistance provided to program participants and provide a copy of this to YCPC CD Department.
 - b. Policies and procedures must provide for an appeal process and a termination policy.
4. Agency prepares Program Participant Rental Assistance Agreement for either CoC Short Term Rental Assistance or for CoC Medium Term Rental Assistance and enters into Agreement with head of household. Agreement includes:
 - a. Property Owner/Agent Rental Assistance Agreement
 - b. lease between program participant and property owner/agent
 - c. amount of assistance and term of assistance
 - d. tenant responsibilities and rights including Agency Termination Policy, Grievance, EEO, Fair Housing, Confidentiality Policy
5. Payment of Rental Assistance
 - a. Case manager confirms that program participant has paid their share of rent
 - b. Upon confirmation, Agency makes rental assistance payment to the property owner, or agent, on a monthly basis for eligible program participants. Receipts of payments to be received from payee
 - c. Agency is required to prepare a policy and procedure guide for financial procedures followed in making and documenting payments and provide a copy of this to YCPC CD Department

Step 7. Housing Stability Plan and Case Management

Agency must provide or connect program participants with case management services. Program participants must meet with a case manager not less than once per month while rental assistance is being provided in order to assist the program participant in maintaining long-term housing stability.

1. Agency and program participant shall develop and implement a plan to obtain and maintain housing stability and to connect to mainstream and other resources as needed.
2. Include in plan how program participant will retain permanent housing after the CoC rental assistance ends, taking into account all relevant considerations, such as, 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 area.
3. Case management services chargeable under the CoC program grant are limited to those necessary to assist program participants obtain and maintain housing.
4. Agency shall conduct an annual assessment of the service needs of the program participants and should adjust services accordingly.
5. Written documentation related to meeting this requirement is required to be maintained in the Agency's program participant file.
6. Agency will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of the title VII of the Act.

Step 8. Termination, Complaints, Appeals and Confidentiality Policies.

Agency must develop policies and procedures regarding a formal process for termination of assistance to participants, complaints, appeals, and confidentiality procedures and submit to CD staff for review. Minimum requirements follow:

1. Must recognize the rights of individuals affected.
2. 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.
3. Provide for written notice to the program participant containing a clear statement of the reasons for termination.
4. Provide for 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**
5. Prompt written notice of the final decision to the program participant.
6. Ability to Provide Further Assistance. Termination does not bar the agency from providing further assistance at a later date to the same family or individual.

Step 9. Documentation to be included in the participant file

1. Initial Contact with Applicant
 - Phone Intake form – if applicable
 - Referral from Coordinated Entry, letters, forms
 - Release of Information
2. Determination of Applicant Housing Status
 - ID and SS cards for all household members
 - Client Intake form with all documents necessary for verification
3. Determination of Applicant Income
 - Calculation with all documents necessary for verification
4. Determination of Eligible Housing Unit for Applicant
 - Property documentation: address, municipal license (in municipalities where this applies), HQS inspection report with determination of conformance or non-conformance, lead screening worksheet, lease, determination of rent reasonableness
 - Property Owner/Agent documentation including proof of ownership, owner's authorization for agent, and contact information for property owner/agent
 - Eligible/non-eligibility of Applicant
5. Determination of eligible/ineligible applicant and unit
 - Notice of determination of assistance for program participant, with appeal process
 - Eligible unit selected by program participant
6. Determination and Payment of Rental Assistance

- Notice of amount and term of assistance, for unit selected by program participant
 - Program Participant Rental Assistance Agreement
 - Property Owner/Agent Rental Assistance Agreement
 - Lease agreement between program participant and property owner/agent
 - Confirmations of program participant payment of their share of rent (if any)
 - Copies of vouchers authorizing payments to property owner/agent
7. Housing Stability Plan and Case Management
- Case management – name of case manager(s), dates of meetings, goals/plans and outcomes
 - Case manager case notes (as applicable)
8. Termination, Complaints, Appeals and Confidentiality Policies
- Notices to program participant for termination, any appeals, and reviews

CONTRACTING WITH COUNTY FOR CoC PROGRAM FUNDS

1. Programs Management and Compliance Department of the YCPC (PMCD) notifies Agencies of annual Notice of Funding Availability (NOFA) for the CoC Program when released by HUD.
2. Agencies submit applications with program description and budget to York City and County Continuum of Care (CoC) Committee.
3. CoC Committee evaluates applications and selects priorities for its application to HUD.
4. When PMCD receives notification from HUD of approved funding, contacts Agency and finalizes description of activity, activity budget, and match sources and amount.
5. When PMCD receives grant contract from HUD, subrecipient agreements are prepared by CD Department and forwarded to Agency for review and signature. CoC grants and subrecipient agreements are for 1 year.
6. Subrecipient agreements are executed by County Commissioners and copy provided to subrecipient Agency.

REQUESTING REIMBURSEMENT AND DOCUMENTING MATCH UNDER THE CoC PROGRAM

CoC Program Activities: Eligible reimbursement under the CoC program is divided into activities as follows:

1. rental assistance component including rental assistance payments made to property owners/agents on behalf of program participants for eligible units and payments of security deposits
2. supportive services including
 - a. case management services for assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants are eligible costs. Component services and activities consist of:
 - (i) Counseling;
 - (ii) Developing, securing, and coordinating services;
 - (iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9).
 - (iv) Obtaining federal, State, and local benefits;
 - (v) Monitoring and evaluating program participant progress;
 - (vi) Providing information and referrals to other providers;
 - (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
 - (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.
 - b. housing search and counseling services for assisting eligible program participants to locate, obtain, and retain suitable housing are eligible costs. Component services and activities consist of:
 - (i) tenant counseling;
 - (ii) assisting individuals and families to understand leases;
 - (iii) securing utilities; and
 - (iv) making moving arrangements.
 - c. Eligible costs for the direct provision of services by the agency include:

- (i) The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and
 - (ii) The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.
3. Program administration for the payment of project administrative costs related to the planning and execution of Continuum of Care activities. Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following
- a. Salaries, wages, and related costs of the staff of subrecipients, or other staff engaged in program administration.
 - b. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose *primary* responsibilities with regard to the program involve program administration assignments, *or* the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only *one* of these methods for each fiscal year grant.
 - c. Program administration assignments include the following:
 - (1) Preparing program budgets and schedules, and amendments to those budgets and schedules;
 - (2) Developing systems for assuring compliance with program requirements;
 - (3) Monitoring program activities for progress and compliance with program requirements;
 - (4) Coordinating the resolution of audit and monitoring findings;
 - (5) Evaluating program results against stated objectives;
 - (6) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.
 - (7) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
 - (8) Training on Continuum of Care requirements. Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings.

Request for Payment Form

- 1. Standard form
 - o CD Department prepares a standard fillable PDF with the activity account numbers and grant amount matching the CoC program funding grant provided to Agency. Short term and medium term RRH RA activities are separate grants. Instructions for completion are attached.
 - o Completion is by agency and includes signature by an approved official in accordance with agency fiscal policies
 - o Submission is to CD Department at least quarterly, with more frequent submissions allowed
- 2. Backup documentation
 - o Invoice and statement showing all direct and indirect staff and operating expenses and rental assistance provided for Rental Assistance program, for the time period for which reimbursement is requested. Eligible costs chargeable to CoC activity account number are those defined in sub-recipient agreement providing CoC funding for the activity.
 - o Match documentation: costs of delivering activities that are eligible under components of the CoC program listed in 24 CFR part 578.37 but not charged to the CoC activity, are to be included as they may qualify towards the required match. Include on invoice and statement with the agency account numbers to which they are charged.
 - o Staff and Operating expenses delivering services and rental assistance as described in Agency application for CoC program funds, as approved by HUD. Staff time spent helping *program participants* in obtaining or maintaining permanent housing and direct delivery of *activity services* may be charged to CoC activity account number.
 - copies of time sheets for all staff charged to the program, for the time period for which reimbursement is requested, showing all accounts charged, including ESG activity account numbers and
 - copies of payroll reports showing employee hours charged to activity account number, rate of pay, paid benefits, and other charges.

- Documentation of one-time operating expenses (training, etc.).
- Documentation for calculation of pro-rata share of recurring operating expenses.
- Rental assistance provided. -
 - Copies of approved and paid vouchers for **all** rental assistance provided by agency to landlords renting to CoC eligible households (24 CFR 576 Definitions),
 - copies of completed rental assistance agreements between Agency and landlords, and with the ESG eligible households.
 - Include designation of which month in assistance continuum is included in this reimbursement.
 - adding CoC activity account number to voucher.
- 3. County payment procedures
 - CD Department reviews the Request and backup documentation.
 - Completed and approved Requests are submitted for drawdown of ESG program funds
 - Upon receipt of ESG program funds, County prepares and send payment to Agency

Fiscal Reporting and Monitoring

1. Fiscal policies and procedures. Submitted by Agency to CD Department upon request
2. Federally approved Indirect Cost Plan. Submitted by Agency to CD Department upon request
3. Audit submission. Submitted by Agency to Programs Management and Compliance Department of YCPC annually within 90 days of end of Agency fiscal year.

CoC PROGRAM MONITORING

CD Department is responsible for monitoring Agencies receiving funding under the CoC program. Annually CD Department will contact Agency and arrange for an office visit.

Monitoring will include review of Agency written policies and procedures for conduct of the CoC program, program participant files, eligible unit files, financial procedures and documentation for payments.

HUD will conduct monitoring of County's CoC programs, which may require on-site or file review of Agency.