



RACINE COC RAPID REHOUSING STANDARDS

1. Eligibility

Standard: The project will assist participants who are literally homeless utilizing a "housing first" approach.

1.1. Eligibility Criteria

To be eligible for RRH assistance, a participant must be literally homeless according to the HEARTH Act ¹ at the time of project entry. The definition used for determining eligibility is:

- 1.1.1. An individual or family with a primary nighttime residence that is a public or private place not
- 1.1.2. designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned buildings, bus or train station, airport or camping ground; An individual or family living in a supervised publicly or privately operated shelter designed 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
- 1.1.3. An individual 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.

Employment, income, criminal history, eviction history, medical conditions, participation in specific programs, and other factors and services are not factors in determining eligibility. The RRH provider must comply with the Fair Housing Act and does not discriminate based on race, color, national origin, religion, sex, sexual orientation, disability, or presence of children.

RRH placements must comply with local law and a provider is unable to provide housing assistance to any individual whose residence in a particular unit is prohibited by local ordinances, statutes, zoning laws, or other.

1.2. Re-Certification

An annual assessment will be conducted within **30-days** of the **12-month** anniversary of enrollment in the project and documented in HMIS. At the time of this assessment, eligibility will be re-evaluated based on the criteria established in 24 CFR 576.401 (b). To remain eligible, the participant's income must not exceed thirty percent (**30%**) of the area median income and the participant must lack sufficient resources and support networks necessary to retain housing without assistance.

¹ [Federal Register Vol. 76 / No 233 / Monday December 5, 2011 / Rules and Regulations, p. 76014](https://www.federalregister.gov/documents/2011/12/05/rules-and-regulations/p-76014)

2. Prioritization

Standard: The project will prioritize eligible participants based on needs and length of homelessness.

2.1. Coordinated Entry

Providers will actively participate in the Coordinated Entry system used by the Continuum of Care for the City and County of Racine according to its standards and procedures.

2.2. Prioritization Process

Project participants will be selected as prioritized for RRH by the COC, based on VI-SPDAT score and then length of time homeless. Both HMIS and non-HMIS housing prioritization lists will be consulted for the selection of each RRH participant. (COVID factors may result in a slightly different prioritization so those at risk are being assisted even though they may not have the highest VI-SPDAT score or longest length of homelessness.)

2.2.1. VAWA: Participant Safety

The Racine CoC considers the safety of its participants seriously, including the safety of participants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with VAWA, all permanent housing providers who provide Emergency Solutions Grant (ESG)-funded rental assistance are required to comply with VAWA, including allowing tenants who are victims to request an emergency transfer from the tenant's current unit to another unit. For more information, see the Racine CoC Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking.

- 2.2.1.1. A victim may request an emergency transfer from their current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.
- 2.2.1.2. Upon request for an emergency transfer, the housing provider must establish an individualized plan within **24-hours** to the tenant and provide a copy of the plan to the tenant in writing.
- 2.2.1.3. Program staff must complete an immediate initial emergency transfer if a safe unit can be identified. The participant will move to the new unit without having to undergo an application process.
- 2.2.1.4. Program participants requesting an emergency transfer will be prioritized above any other households for open units.
- 2.2.1.5. Agencies participating in Coordinated Entry must accept emergency transfers as they have available units that are deemed safe.

3. Participant Intake

Standard: Participant eligibility for the project will be determined at intake, following selection through Coordinated Entry. Eligible participants will be oriented on the project and their rights and responsibilities and enrolled if they choose to participate

During intake, the Rapid Rehousing Case Manager will:

- 3.1.1. **Eligibility:** Determine eligibility for the project and enroll eligible participants
- 3.1.2. **Participant Data:** Collect relevant personal information for all household members for program entry in HMIS
- 3.1.3. **Program Explanation:** Explain the project and provide the participant with a project summary.
- 3.1.4. **Service Agreement:** Explain the service agreement and have the participant sign a service agreement.
- 3.1.5. **HMIS Release:** Explain the HMIS system and have the participant sign an HMIS release according to his or her preferences.
- 3.1.6. **Termination Procedures:** Explain the Termination and Grievance Procedures and have the participant sign them

4. Housing Search and Placement Services

Standard: The project will assist participants in locating safe, affordable housing that meets the participant's needs within ESG and other funding guidelines.

4.1. Participant Responsibility

It is the responsibility of the participant, with the assistance of the RRH provider, to identify a unit that meets project requirements and sign a lease within **60-days** of enrollment. Failure to meet this requirement will result in exiting the participant from the project. This action does not preclude the participant from being enrolled and receiving services again at a later date. (Agencies may extend this deadline for extenuating circumstances which must be stated in the client file.)

4.2. Housing Unit Requirements

Prior to providing rental assistance, the RRH case manager will ensure that any unit selected by the participant meets the following criteria:

- 4.2.1. **Fair Market Rent:** The unit does not exceed current HUD approved Fair Market rent as provided under 24 CFR part 88.
- 4.2.2. **Rent Reasonableness:** The gross rent is determined to be reasonable for similar units in the area according to standards established under 24 CFR 982.507'.
- 4.2.3. **Habitability Standards:** The unit has passed a habitability standards inspection according to the standards described in 24 CFR 576.403 (c)
- 4.2.4. **Lead Based Paint:** The unit has passed a lead-based paint inspection in compliance with 24 CFR 576.403(a)
- 4.2.5. **Rental Assistance Agreement:** The landlord / property manager has signed a rental assistance agreement with the RRH provider.

- 4.2.6. **Lease:** The landlord has executed a legally binding lease with the participant in accordance with 24 CFR 576.106 (g) ²

4.3. Housing Search and Placement Services

The case manager will assist the participant to develop a housing search plan. The case manager will assist in identifying available units, but it remains participant's responsibility to identify and select a unit that meets their needs and project requirements. The RRH Case Manager will:

- 4.3.1. Identify potential housing placement barriers, such as criminal or eviction history
- 4.3.2. Explore participant needs, such as accessibility, location, type of unit
- 4.3.3. Develop and document a housing search and placement plan, signed by the participant and case manager.
- 4.3.4. Provide the participant with a "housing search letter" to provide to landlords that explains the project, confirms participation, and provides information on the type of unit sought.
- 4.3.5. Conduct habitability standards inspections of units identified by the participant as suitable and potentially eligible.
- 4.3.6. Meet with potential landlords to discuss the project and complete required documentation

5. Housing Services

Standard: The project will provide tenant based rental assistance and other housing services to assist participants to enter and maintain a suitable unit while enrolled.

5.1. Participant Requirements

The participant who is head of household must personally occupy any unit supported by RRH housing services. Failure to personally occupy the unit for any reason, including residence in an institutional facility, for a period of **90 consecutive days** will result in termination from the project.

5.2. Security Deposit Assistance

The project may provide security deposit assistance for up to the equivalent of two month's rent per participant, payable to the landlord. Any remaining security deposits are returned by the landlord to the tenant in the event that the tenant leaves the unit after exiting the project.

5.3. Rent Payment Assistance

Goal is to achieve housing stability as quickly as possible within a 24 month period.

5.3.1. Duration

- 5.3.1.1. The project may provide tenant based rental assistance for up to 24 out of 36 months as long as client remains eligible.
- 5.3.1.2. In the event that an individual leaves the program and re-enters it at a later date, the maximum assistance allowable is 24-months of rental assistance within a 36-month period for ESG funded projects.
- 5.3.1.3. There is no financial limit on the total dollar amount of rental assistance

² [Federal Register Vol. 76/No 233/Monday December 5, 2011/Rules and Regulations, p. 76014](https://www.federalregister.gov/documents/2011/12/05/rules-and-regulations-p-76014)

paid.

5.3.1.4. All clients shall receive an initial term of six (6) months of rental assistance and case management. Thereafter, the amount and length of rental assistance and case management will be assessed considering the following factors: household income, family composition, debt, and other extenuating circumstances that impact the ability of the family to achieve housing stability. The reasons for extending or denying rental assistance and the amount must be clearly stated in the client file. The goal is for the household to increase the amount of rent paid so that the amount of rental assistance is decreased over a reasonable timeframe.

5.3.2. **Subsidy Guidelines**

Participants will not be required to contribute towards their rent payment during the first **6 months** of occupancy.

Starting with the **seventh month** of occupancy and any month thereafter, participants who have an income will be required to contribute thirty percent (**30%**) of their adjusted gross income towards their rent payment, payable directly to the landlord. Adjusted income will be determined as per 24 CFR 5.609 and 24 CFR 5.611.

5.4. **Utility Payment Assistance**

5.4.1. **Utility Arrears Payment**

The project may pay up to the equivalent of **6-months** of arrears per participant as described in 24 CFR 576.105 (a)(5). One month's arrears will be considered the current monthly utility allowance for the participant's unit.

5.4.2. **Utility Payments**

The project may pay utilities on behalf of project participants who have no income. Participants who have income are required to pay their own utilities.

6. **Housing Stability Services**

Standard: The Project will provide on-going case management to assist each participant to maintain housing stability and exit the project into permanent housing.

6.1. **Participant Requirement**

Participants will be required to meet with their assigned case manager at least once per month from enrollment until they have exited the project.

6.2. **Housing Stability Plan**

The case manager and participant will develop a housing stability plan. The plan will determine the amount of income and other services needed to maintain housing stability after leaving the project. The plan will identify action steps to assist the participant in accessing resources that will result in housing stability and the participant exiting the project into permanent housing

6.3. **Housing Stability Case Management**

Housing stability case management may be provided without rental assistance or in

conjunction with rental assistance. The project will provide case management to assist the participant in achieving housing stability. Housing stability case management may include:

- 6.3.1. Up to **30-days** may be provided while the client is residing in shelter or on the street for the purpose of seeking permanent housing.
- 6.3.2. Once the program participant is in permanent housing case management may be provided up to an additional **24-months**
- 6.3.3. Referrals to mainstream services and other service providers
- 6.3.4. Applications to subsidized housing units and housing voucher programs
- 6.3.5. Mediation between the participant and landlords, property managers, or others who may influence the participant's housing stability
- 6.3.6. Provision of information concerning opportunities, such as employment opportunities,
- 6.3.7. Educational opportunities, trainings, and workshops, etc.

7. Eviction of Participant

7.1. Participant Requirement

Participants are expected to comply with the terms of their lease agreement. In the event that a participant is evicted from his or her RRH-supported unit, the participant will have **60 days** to identify and sign documentation for a new unit per the standards for housing search and placement services.

7.2. Security Deposit

The project may pay a maximum of **two months** security deposit with ESG funding. In the event that a participant is evicted and has already received **two months** security deposit assistance, it will be the participant's responsibility to pay for any additional security deposit unless other funding is available.

8. Participation Files and Documentation

Standard: Records documenting participant eligibility and participation in the project will be securely kept in participant files and HMIS.

8.1. Participant Files

Participant files will be kept in a locked filing cabinet, or in a locked office. At a minimum, each participant's file will contain

- 8.1.1. Updated File Check List
- 8.1.2. Documentation of Eligibility at project entry (3rd Party Documentation, Homeless Verification Form, or screenshot showing residence in Emergency Shelter)
- 8.1.3. Documentation of Annual Re-Certification of Project Eligibility Declaration of Income signed by participant
- 8.1.4. Documentation of selection through Coordinated Entry Service agreement signed by participant and case manager HMIS agreement signed by participant

- 8.1.5. Termination procedures signed by the participant Signed Releases of Information
- 8.1.6. Housing Search Plan
- 8.1.7. Housing Search Letter signed by case manager
- 8.1.8. Mainstream Resources Checklist documenting mainstream resources accessed by the participant
- 8.1.9. Habitability Inspection signed by case manager Documentation of compliance with FMR Documentation of compliance with reasonableness
- 8.1.10. Rent Payment Assistance Agreement signed by case manager, landlord, participant, and executive director
- 8.1.11. Copy of lease signed by landlord and participant
- 8.1.12. Copy of all payments made for Security Deposit Assistance, Rent Payment Assistance, Utility Payment or Arrears Payment Assistance
- 8.1.13. Correspondence with the participant and/or landlord/property manager

8.2. HMIS Documentation

Standard: The case manager will use case notes and other functions in HMIS according to current HMIS standards. At a minimum, the case manager will document the following in HMIS:

- 8.2.1. All participant data related to universal data elements and rapid rehousing HMIS requirements
- 8.2.2. Acceptance or Cancellation of Coordinated Entry Referrals and Service Associated with the Referrals
- 8.2.3. Case Notes for each meeting with the client
- 8.2.4. Referrals to other agencies and services Housing Stability Case Plan

8.3. Monitoring

In the event that the project is monitored, the case manager will print case notes, case plans, and, if appropriate, screenshots of referrals to accompany any files selected by the monitoring officials for review. Documentation must be sufficient for monitoring.

9. Termination

Standard: All reasonable efforts will be made to avoid the termination of a participant from a RRH program. When termination is necessary for non-compliance, due process will be followed, and participants will be given the right to appeal their termination.

9.1. Termination Procedures

All program participants have the right to be heard regarding complaints, or if they believe that they are not being treated fairly. Any Rapid Rehousing participant who wishes to file a complaint or grievance may do so according to the *Grievance Procedure*.

Upon entering the Rapid Rehousing Program, participants will receive and sign a service agreement that outlines the requirements of the program. If the participant becomes non-compliant with the terms of the service agreement, efforts will first be made to contact the participant, discuss the cause of non-compliance, and restore compliance. If the participant continues to be non-compliant with program requirements, the RRH provider

reserves the right to terminate rental assistance and other assistance according to the following procedure:

- 9.1.1. The participant shall be informed in writing that he/she is non-compliant with the service agreement and given a period of **15 days** to restore compliance. The participant will be informed in writing that failure to restore compliance in that period shall result in termination of rental assistance.
- 9.1.2. In the event that compliance is not restored, the participant shall be informed in writing that assistance is being terminated on a date given and provided with an explanation for the termination. The participant will be given at least 15 days to appeal the decision to the executive director of the RRH provider. If an appeal is made, the participant will receive written notice of the final decision made regarding the termination.

Termination does not preclude the participant from accessing services from a RRH provider at a later date.

10. Grievance Procedure

Standard: The participant has the right to register a formal complaint regarding Rapid Rehousing services and will not be denied these services based upon such complaints. The Grievance Policy must be presented to participants at intake

10.1. Grievance Procedures

This Grievance Procedure is applicable to the RRH provider. A participant in any of those programs has a right to register formal complaints regarding the services provided and will not be denied services based upon such complaints. The participant has the right to be accompanied by an advocate (e.g., coworker, friend, family member, etc.) at each step of the grievance process. The participant may also withdraw a complaint at any time.

This grievance procedure is intended to address issues specific to the RRH provider/program and is not intended to address complaints lodged by one participant in reference to another participant's issues; neither is it expected to address complaints regarding other agencies or programs.

- 10.1.1. **Step 1:** The Participant requests to file a grievance related to the Rapid Rehousing Program.

The participant expresses a concern or complaint and is directed to the RRH provider to obtain a Concern Form. The RRH provider will explain each step of the procedure to the participant and assist in proper completion of the Concern Form. The completed form must be returned to the RRH provider by the participant within **30 days** of the incident.

- 10.1.2. **Step 2:** The RRH provider directs the Concern Form to the case manager

The RRH provider will review the form for completeness and timeliness and submit it to the appropriate case manager within 5 business days of receipt from the client. Late or incomplete forms will not be accepted. The case manager will attempt to set up a face-to-face meeting to resolve the matter with the participant within **5 business days** of receipt of the Concern Form from the RRH provider.

The participant may have an advocate and/or the RRH provider present while meeting with the case manager.

If the participant is satisfied with the proposed resolution of the issue during the meeting, they will sign on the Concern Form indicated so, and the issue will be closed

If the Case Manager is unable to resolve the issue to the participant's satisfaction, he or she may ask the RRH provider to present the concern to the Executive Director within **5 working days** of the meeting with the Case Manager (Step 3).

10.1.3. **Step 3:** The RRH provider directs to Concern Form to the Executive Director

The Executive Director will review the Concern Form and then meet with the Participant without the Case Manager present within 5 working days of receiving the Concern Form.

If the Executive Director is able to resolve the matter, the Participant will sign the Concern Form indicating satisfaction and closing the issue

If the Executive Director is unable to resolve the matter to the satisfaction of the Participant, the Participant may ask the RRH provider representative to direct the Concern Form to the Board of Directors of the RRH provider representative, indicating satisfaction and closing the issue.

10.1.4. **Step 4:** The RRH provider representative directs the Concern Form to the Board of Directors

A board committee will review the Concern Form on behalf of the Board of Directors and attempt to meet with the Participant. The Board of Directors will decide on the issue or concern within 15 working days of receiving the Concern Form and provide their decision to the Participant in writing.

10.1.5. **Step 5:** The BOD of the RRH provider directs an Appeal to the Lead Agency for the funding source

The participant may appeal a decision of the RRH provider BOD to the Lead Agency for the funding source. Such appeal shall be heard by an ad hoc committee of **at least 3 CoC members**. The only issues to be considered by the CoC are whether the RRH provider complied with these standards and Federal regulations for the HUD ESG program.

~ END ~