

**Rapid Re-housing & Permanent Supportive Housing  
Policies & Procedures**

**Bridging the Gap Continuum of Care  
November 2020**

## Table of Contents

I.	OVERARCHING STANDARDS FOR ALL PROJECT TYPES.....	3
A.	COORDINATED ENTRY SYSTEM PARTICIPATION.....	3
B.	ACCESS TO MAINSTREAM RESOURCES.....	3
C.	HMIS PARTICIPATION.....	3
D.	EDUCATIONAL RESPONSIBILITIES.....	4
E.	TERMINATION AND GRIEVANCE PROCEDURES.....	4
F.	HOUSING FIRST.....	5
G.	FAIR HOUSING AND EQUAL OPPORTUNITY.....	5
H.	CONFLICT OF INTEREST AND CONFIDENTIALITY.....	5
I.	ADDITIONAL FEDERAL REQUIREMENTS.....	6
J.	SUBSTANTIAL CHANGES TO CoC PROJECTS.....	6
II.	ESG AND CoC RAPID RE-HOUSING STANDARDS.....	7
A.	RAPID RE-HOUSING (RRH).....	7
B.	HUD COC AND ESG FUNDED RAPID RE-HOUSING ELIGIBILITY.....	7
C.	DOCUMENTING ELIGIBILITY.....	7
D.	EVALUATIONS.....	9
E.	PRIORITIZATION FOR RAPID RE-HOUSING ASSISTANCE.....	9
F.	MINIMUM STANDARDS FOR RAPID RE-HOUSING ASSISTANCE.....	9
G.	DETERMINING RENTAL ASSISTANCE LIMITS.....	10
H.	RRH PERFORMANCE MEASURES:.....	10
I.	MINIMUM PROGRAM REQUIREMENTS FOR RRH.....	10
III.	CONTINUUM OF CARE (COC) PROGRAM STANDARDS.....	12
A.	PERMANENT SUPPORTIVE HOUSING (PSH).....	12
B.	CoC PSH ELIGIBILITY.....	12
C.	DOCUMENTING ELIGIBILITY.....	13
D.	PRIORITIZATION FOR PSH ASSISTANCE.....	13
E.	STANDARDS FOR CoC PSH RENTAL ASSISTANCE.....	16
F.	STANDARDS FOR CoC LEASING.....	17
G.	STANDARDS FOR OPERATING COSTS.....	18
H.	SUPPORTIVE SERVICES.....	18
IV.	Exhibits.....	20
A.	Exhibit 1: Eligibility Criteria Summary for BTG ESG and CoC Rapid Re-Housing.....	20
B.	Exhibit 2: HUD Homeless Definition and Documentation.....	21
C.	Exhibit 3: Eligible Costs Summary.....	24

D. Exhibit 4: Rental Assistance Overview .....	26
E. Exhibit 5: Supportive Services Overview.....	28
F. Exhibit 6: Written Standards.....	30
G. Exhibit 7: Required Identification Documents for Tenancy, ESG RRH & CoC RRH/PSH.....	30
H. Exhibit 8: Annual Income: 24 CFR § 5.609, ESG RRH & CoC RRH/PSH.....	33

## **I. OVERARCHING STANDARDS FOR ALL PROJECT TYPES**

### **A. COORDINATED ENTRY SYSTEM PARTICIPATION**

The Bridging the Gap (BTG) Coordinated Entry System (CES) is a fair, immediate, low barrier, person-centered process that helps communities prioritize housing assistance based on vulnerability and severity of service needs. This process is designed to ensure that people who need assistance the most can receive it in a timely manner by coordinating program participant access, assessment, and referral to homeless housing and services. CES participating agencies are required to adhere to all policies and procedures established by BTG. Every agency that receives U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) or Emergency Solutions Grant (ESG) funding shall fully participate in and accept referrals only through the BTG Coordinated Entry System for applicable programs.

BTG's CES process begins with assertive community outreach to identify and engage the homeless, then utilizing a common triage tool, the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT), to assign a vulnerability score. Each county shall develop and adhere to a by-name list with corresponding VI-SPDAT scores so that, based on vulnerability and other prioritization factors, all homeless individuals can be matched with the resources most appropriate to their needs. When necessary, local county representatives will convene case conferencing (CC) meetings throughout all rural county jurisdictions.

### **B. ACCESS TO MAINSTREAM RESOURCES**

All agencies funded through the CoC or ESG programs shall coordinate with and access mainstream and other targeted homeless resources. Organizations shall assess and assist program participants with obtaining any mainstream resource for which they may be eligible for including, but not limited to, Temporary Assistance for Needy Families (TANF), Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Federally Qualified Health Plan (Affordable Care Act), Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), and other federal and local benefits.

### **C. HMIS PARTICIPATION**

All CoC and ESG-funded projects are required to participate in the BTG CaseWorthy Homeless Management Information System (HMIS). Providers shall collect and enter all required participant-level data using the HMIS in accordance with all data standards, policies, and procedures as determined by the CoC. In addition, the CoC strongly encourages non-CoC/ESG funded organizations to participate in the HMIS.

HMIS Minimum Requirements:

- a. Collect and enter all required participant level data using the HMIS in accordance with all data standards, policies, and procedures as determined by the provider's CoC.
- b. Comply with the following data standards:
  - (1) Search before creating new enrollment in HMIS to avoid duplication.
  - (2) Complete data entry within 72 hours of activity or service (e.g., program entry, program exit, assessment, provision of assistance, etc.)

- (3) Data Quality Rates for null, missing, refused, or unknown shall be less than 10% for both universal data elements and program specific data elements.
- c. Track and report outcome data at least quarterly and use that data to provide continuous quality improvement efforts aimed at strengthening outcomes, such as increasing participant income, decreasing length of homelessness, rapidly securing permanent housing placements, and assisting participants to stabilize in and retain housing.
- d. Develop and maintain a comprehensive policy and procedures for reporting, resolving, and documenting and reviewing critical incidents.
- e. Make adjustments to policies, procedures, facilities, and program design as needed to improve Participant well-being and promote health and safety for Participants and staff.
- f. Service provider shall seek input from people with lived experience of homelessness and, when applicable landlords, to guide program design and operations. Such input can be obtained through interviews, focus groups, surveys and/or consumer advisory boards.
- g. Service provider shall have and utilize a comprehensive policy and procedures for surveying program participants, at least annually, to assess satisfaction with and obtain input regarding program services, staffing, and facilities. Service provider shall make adjustments to policies, procedures, facilities, and program design as needed to improve participant satisfaction.

D. EDUCATIONAL RESPONSIBILITIES

ESG and CoC funded projects that serve households with children shall ensure that participants are assisted to understand their educational rights established under Subtitle VII-B of the McKinney-Vento Homeless Assistance Act and most recently reauthorized by the Every Student Succeeds Act; ensuring that children and young adults are immediately enrolled in school, as required by federal and State law; and to ensure that they are connected to educational services to help them succeed in school.

The Program Director and/or designee shall be responsible for providing educational services, including but not limited to, those which ensure children are:

- a. Enrolled in school
- b. Connected to appropriate services in the community, including early childhood projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services
- c. Supported for academic success
- d. Receiving the transportation services to which they are entitled

E. TERMINATION AND GRIEVANCE PROCEDURES

All ESG and CoC funded agencies shall allow program participants the right to a formal and documented due process. This process shall minimally consist of the following:

- a. Written notification containing a clear statement of the reasons for termination or denial of assistance, the specific date for which assistance will cease, the right of the participant to have a review of the decision, instructions on how the participant is to evoke this review, the right of the participant to review the records and the right to counsel at the sole expense of participant during this review;

- b. Upon request by the participant, a review of the decision with the opportunity to present written or oral objections and to be represented by counsel at his or her own expense before a person other than the person who made or approved the termination or denial decision. The participant shall have the opportunity to question witnesses and present evidence;
- c. Prompt service of the final decision in writing to the participant.
- e. The agency's grievance procedures shall include language that if the claimant is not satisfied with the service provider's final determination, a formal review of the decision may be requested of the primary grant administrator. The agency shall provide the claimant with appropriate contact information.

#### F. HOUSING FIRST

The Housing First model was adopted and implemented by BTG as the guiding principle for service delivery by all homeless programs. The HF model emphasizes providing support for stable housing as an important first, rather than last, step in the transition to independently sustained permanent housing, as follows:

- a. The goals of the HF model are to help homeless households access permanent housing as rapidly as possible by removing barriers to program entry, assisting with quickly locating and accessing housing options, providing case management services, supporting post housing to promote stability, and helping to prevent evictions and returns to Homelessness.
- b. Pre-conditions to program entry such as sobriety and completion of treatment programs are not consistent with the HF approach. The expectations are that households will assume the full rights and responsibilities of tenancy and meet standard lease obligations.
- c. Service provider staff shall use assertive engagement strategies to teach tenancy skills, assist households in achieving housing goals, connect households with income through employment and benefits, make connections to community services and stabilization supports, and help prevent eviction and returns to homelessness.

#### G. FAIR HOUSING AND EQUAL OPPORTUNITY

All recipients and subrecipients of ESG and CoC funding must comply with the non-discrimination and equal opportunity provisions of [Federal civil rights, fair housing](#) and related statutes and regulations, including, but not limited to the following:

- Fair Housing Act
- Section 504 of the Rehabilitation Act
- Title VI of the Civil Rights Act
- Title II of the Americans with Disabilities Act
- HUD's Equal Access Rule
- All other local requirements including Language Access Reports

#### H. CONFLICT OF INTEREST AND CONFIDENTIALITY

All recipients and subrecipients of ESG and CoC funding must comply with Conflicts of Interest and Confidentiality provisions found respectively at 24 CFR §576.404 and §576.500 for ESG; and at §578.95 and §578.103 for CoC. Written standards for compliance must be documented in service providers' policies and procedures.

BTG Transparency, Conflict of Interest, Code of Conduct, and Non-Discrimination Policies may be found in the [Bridging the Gap Governance Charter](#).

I. ADDITIONAL FEDERAL REQUIREMENTS

BTG subrecipients will be required by the grant recipient to submit reports and/or informational forms, including but not limited to:

a. Environmental Review.

Activities under this part are subject to environmental review by HUD under 24 CFR part 50 and 24 CFR part 58. The recipient or subrecipient shall supply all available, relevant information necessary for HUD to perform, for each property, any environmental review required by 24 CFR part 50 and 24 CFR part 58. Detailed information and specific environmental forms may be found at:

[CoC Program Environmental Review Resources](#)

b. Transparency Act Reporting.

Section 872 of the Duncan Hunter Defense Appropriations Act of 2009, and additional requirements published by the Office of Management and Budget (OMB), requires recipients to report subawards made either as pass-through awards, subrecipient awards, or vendor awards. More information may be found at:

[Federal Funding Accountability and Transparency Act Subaward Reporting System \(FSRS\)](#)

c. Audits.

The subrecipient shall make available as requested, an audit of its financial records performed by an independent Certified Public Accountant. In addition, the subrecipient shall permit the funder, grant recipient and auditors to have access to financial records and statements as necessary to meet requirements under 2 CFR Part 200.

d. 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, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by CoC and ESG program participants.

See regulations at: [24 CFR part 35](#)

J. SUBSTANTIAL CHANGES TO CoC PROJECTS

Requests for any substantial changes to CoC projects during the grant term must be reviewed and approved by the BTG Board. Requests to make substantial changes without BTG Board approval will be reflected in the upcoming Notice of Funding Availability (NOFA) application. Such modifications are those which deviate from the Provider's NOFA application and may potentially affect the CoC as a whole, including but not limited to:

a. Extension of grant expiration date

b. Re-allocation of funds in excess of 10% from one budget line item to another

c. Housing type and location

d. Project participants/subpopulations

## II. ESG AND CoC RAPID RE-HOUSING STANDARDS

(Complete regulations can be found at:

[Electronic Code of Federal Regulations \(eCFR\) for ESG – 24 CFR 576 and CoC – 24 CFR 578](#) )

### A. RAPID RE-HOUSING (RRH)

RRH is an intervention designed to help individuals and families to quickly exit homelessness, return to housing in the community, and limit returns to homelessness in the near term. At minimum, the program must provide services which make up the core components of a rapid re-housing program: housing identification, move-in and rent assistance, and rapid re-housing case management and services. RRH programs shall provide housing relocation and stabilization services and short- or medium-term rental assistance as needed to help households experiencing homelessness move as quickly as possible to permanent housing and achieve stability in that housing.

### B. HUD COC AND ESG FUNDED RAPID RE-HOUSING ELIGIBILITY

(See also Exhibit 1: Eligibility Criteria Summary for BTG ESG and CoC Rapid Re-Housing)

#### a. Eligibility Requirements:

Initial eligibility for RRH projects funded with either ESG or CoC program funding shall be limited to individuals or families who are either:

- (1) Literally homeless (defined as an individual or family who is living in a public or private place not meant for habitation or in a temporary shelter, which includes congregate shelters); or
- (2) Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions.

b. There shall be no minimum or maximum income limits for either ESG- or CoC-funded RRH projects when determining the initial eligibility of a household.

### C. DOCUMENTING ELIGIBILITY

(See also Exhibit 2- HUD Homeless Definition and Documentation)

Agencies receiving grant funding for RRH under the CoC and ESG programs must document and maintain records related to participant eligibility and the services provided to participants. Each client file must include documentation of homeless status and other program eligibility, and comply with HUD's recordkeeping requirements. Listed below are HUD's order of priority for documentation:

#### a. Third Party: Preferred method of documentation. This step must be attempted first.

- (1) Oral or written verification from a third party verifying current homeless status of client.
- (2) The written documentation must include reference to type of homelessness to determine which HUD Category the person meets. Written documentation includes official communication (written on agency letterhead or program template), signed and dated by appropriate third party representative.
- (3) Third party source can be: case manager, outreach worker, landlord evicting person, or family/friend who is terminating the person's residency.
- (4) Written verification can include HMIS report or other already available documentation.

- (5) Recorded oral statements by intake staff and/or third party providing verification, with signed/dated attestation.
- b. Intake staff observation: Allowable after unsuccessfully attempting Third Party documentation.
  - (1) Homeless program staff self-verifies status based on observation, program record or HMIS record.
  - (2) Documentation must be written, include information related to type of homelessness, and include how staff first attempted to obtain Third Party verification. Must be signed and dated by intake staff as true and complete.
- c. Self-certification: Allowable only after unsuccessfully attempting third party or intake observation.
  - (1) Letter written and signed by client (head of household) briefly explaining homelessness and that they have no resources or safe place to stay.
  - (2) Due diligence documentation by intake staff describing efforts to obtain third party documentation, outcome of efforts including obstacles, and signed/dated by intake staff as true and complete.
- d. Additional guidance for documenting homeless status:
  - (1) Intake workers are responsible for obtaining the evidence of homeless status, not the client.
  - (2) An intake worker should not contact anyone for documentation that the client feels would jeopardize his or her safety.
  - (3) Self-certification from the person that they meet homeless criteria of HUD Category can be accepted in most instances, but Third Party and Intake Observation must first be attempted and documented.
  - (4) When documenting homeless status using Category 4 (fleeing or attempting to flee domestic violence), the intake worker needs to ask only enough questions to understand the situation.
- e. Other program eligibility verification:
 

Document compliance with any other program eligibility criteria specific to the individual project. Service providers must keep records that outline the services and financial assistance provided for all participants, including:

  - (1) Evidence that, at a minimum, quarterly assessments of service needs were completed (certain programs require more frequent assessments).
  - (2) When a participant is terminated from the program, evidence that all applicable federal requirements were followed.
  - (3) Annual Income: For the purposes of documenting eligibility upon re-evaluation and when any kind of rent is paid by program participants, service providers must keep the following documentation of annual income:
    - i. Income evaluation form.
    - ii. Source documents (wage statements, bank statements, etc.).
- f. RRH program serving chronically homeless:
 

In addition to the above requirements, where RRH projects are serving persons experiencing chronic homelessness, and where RRH may be used as a bridge to a permanent supportive housing (PSH) placement, chronic homelessness must be documented. The recordkeeping requirements in the Defining “Chronically Homeless” Final Rule apply only to CoC-funded PSH projects that are required to serve this population (i.e., dedicated PSH). However, CoC- and ESG-funded RRH projects that serve persons experiencing chronic homelessness where the household may ultimately need permanent supportive housing should use the time in which

the household is in the RRH project to gather supporting third-party documentation that will be required at the point of intake into PSH. The PSH service provider will be required to demonstrate that the household was chronically homeless and eligible for the PSH project at the time the household entered the RRH project.

D. EVALUATIONS

- a. ESG- and CoC-funded agencies must conduct interim evaluations of participants (for ESG this is referred to as recertification). The first evaluation must occur 3 months after enrollment. Any additional months of assistance or subsidies beyond the first 3 months may be provided on a month-to-month basis (with reevaluations each month). To continue to receive rental assistance under both ESG and CoC-funded programs, the participant must continue to lack sufficient resources and support networks to retain housing without RRH assistance. In interim evaluations, service providers must also reassess the type and amount of assistance that the household is receiving and make adjustments as needed.
- b. While interim evaluations must be completed more frequently, annual re-evaluations are required by HUD for participants in ESG-funded RRH projects. To remain eligible, households must have income at or below 30 percent of the Area Median Income (AMI).

E. PRIORITIZATION FOR RAPID RE-HOUSING ASSISTANCE

- a. RRH projects will be targeted to the highest-need households, to the maximum extent possible, within the applicable VISPDAT vulnerability score range.
- b. Eligible households with higher barriers to housing shall be screened in and will not be subjected to additional criteria designed to determine whether a household is housing-ready (i.e., sobriety, employability, willingness to participate in services, etc.).
- c. All households served in CoC- and ESG-funded RRH projects must be referred through BTG's Coordinated Entry System using its current prioritization method.
- d. There shall be no project-specific waiting lists or project-specific prioritization policies that exist outside of BTG CES.

F. MINIMUM STANDARDS FOR RAPID RE-HOUSING ASSISTANCE

(See also Exhibit 3: Eligible Costs Summary, Exhibit 4: Rental Assistance Overview, and Exhibit 5: Supportive Services Overview)

The following minimum standards shall be applied to all Rapid Re-housing projects:

- a. Maximum participation in a rapid re-housing program cannot exceed 24 months in any three-year period.
- b. Supportive services must be offered throughout the duration of stay in housing.
- c. Participants are required to meet with a housing stabilization specialist not less than once per month to assist the participant in ensuring long-term housing stability.
- d. Participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party
- e. Must re-evaluate quarterly that the participant lacks sufficient resources and support networks necessary to retain housing without assistance.

- f. Rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent (FMR) established by HUD, and/or complies with HUD's standard of rent reasonableness.

G. DETERMINING RENTAL ASSISTANCE LIMITS

(See also Exhibit 3: Eligible Costs Summary and Exhibit 8: Annual Income)

- a. Each household may receive up to 24 months of assistance.
- b. Maximum financial assistance per household is up to the FMR standards for ESG RRH, and up to rent reasonableness standards for CoC RRH over a 24-month period.
- c. Participants may be required to contribute towards rental costs, and that the tenant share not exceed:
  - (1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses); or
  - (2) 10 percent of the family's monthly income; or
  - (3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs. Income must be calculated in accordance with 24 CFR 5.609- Annual Income, and 24 CFR 5.611(a) - Adjusted Income.
- d. A program participant's total contribution toward rent and utilities must be impartially and consistently applied to all participants served in CoC- and ESG-funded RRH programs. If the participant pays separately for utilities, the monthly utility allowance established by the Public Housing Authority serving the area in which the housing is located shall be utilized.
- e. Rental assistance shall be provided in a flexible and progressive manner that is adapted to the household's needs.
- f. Participants will be evaluated every 3 months to determine if further assistance is needed. All documents required at entry will be required at evaluation.

H. RRH PERFORMANCE MEASURES:

- a. The effectiveness of a rapid re-housing program is determined based on a program's ability to accomplish the model's three primary goals:
  - (1) Reduce the length of time program participants spend homeless,
  - (2) Exit households to permanent housing, and
  - (3) Limit returns to homelessness within a year of program exit.

I. MINIMUM PROGRAM REQUIREMENTS FOR RRH

- a. Program staff must be trained on the regulatory requirements of all RRH funding streams and on the ethical use and application of the program's financial assistance policies.
- b. The program must have clearly defined policies and procedures for determining the amount of financial assistance provided to a household, as well as defined and objective standards for determining when case management and financial assistance should continue and end.
- c. The program must have clearly defined, written standards for participant assessments

and intake, determination of participants' eligibility, initial evaluation (certification) of participants, reevaluation (recertification) of participants, terminating assistance, appeals of terminations, emergency transfers under the Violence Against Women Act (VAWA), and participant files.

- d. When households are expected to pay an amount toward their housing, the program must have written policies and procedures for determining that amount, and the amount must be reasonable in relation to the participant's income.
- e. A progressive approach must be used to determine the duration and amount of rental assistance. Policies detailing this approach should cover decision-making guidelines and reevaluation processes.
- f. The program must provide, when needed, financial assistance for housing costs.
- g. The program must issue checks quickly and on time and must have the capacity to track payments to landlords and other vendors.
- h. The program must have the capacity to pay reasonable back rent and utility arrears that directly prevent a household from being able to sign a lease. Rent arrears cannot be paid once they are in collections.
- i. The program must help households meet basic needs at move-in.
- j. The process used to transition the household off of financial assistance must be coordinated with case management efforts that help the household assume and sustainably cope with their housing costs.

### III. CONTINUUM OF CARE (COC) PROGRAM STANDARDS

Eligible activities under the CoC Programs include the following components:

- Rental Assistance (24 CFR§ 578.51)
- Leasing (24 CFR§ 578.49)
- Operating (24 CFR§ 578.55)
- Supportive Services (24 CFR§ 578.53)
- Project Administration (24 CFR§ 578.59)
- HMIS (24 CFR§ 578.57)
- Acquisition, Rehabilitation and New Construction (24 CFR§ 578.43-47)

This section will focus on current BTG project types which include activities under Rental Assistance and Leasing for Permanent Supportive Housing (PSH), Operating, and Supportive Services components.

#### A. PERMANENT SUPPORTIVE HOUSING (PSH)

Permanent supportive housing is an intervention that combines affordable housing assistance with voluntary support services to address the needs of homeless people. The services are designed to build independent living and tenancy skills and connect people with community-based supports such as health care, treatment and employment services. To be considered permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.

#### B. CoC PSH ELIGIBILITY

##### a. Eligibility Requirements:

CoC PSH program funding shall be limited to individuals or families who are either:

(1) Literally homeless (defined as an individual or family who is living in a public or private place not meant for habitation or in a temporary shelter, which includes congregate shelters); or

(2) Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions.

b. PSH can only provide assistance to individuals with disabilities and families in which one adult or child has a disability (see definition below, item d(3)). Supportive services designed to meet the needs of the program participants must be made available to the program participants.

c. PSH projects have the following additional NOFA limitations on eligibility within Category 1, Literally Homeless:

(1) Individuals and Families coming from transitional housing (TH) must have originally come from the streets or emergency shelter or safe haven;

(2) Projects that are dedicated chronically homeless projects, including those that were originally funded as Samaritan Bonus Initiative Projects, must continue to serve chronically homeless (see definition below, items d (1) – (3)) persons exclusively; and

- (3) Projects funded under the Permanent Supportive Housing Bonus must continue to serve the homeless population outlined in the NOFA under which the project was originally awarded.
- d. “Chronically homeless (CH)” is defined as an individual or family that:
  - (1) is homeless and lives or resides in a place not meant for human habitation, a safe haven, or in an emergency shelter;
  - (2) has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years where those occasions cumulatively total at least 12 months; and
  - (3) has an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance abuse disorder, serious mental illness, developmental disability (as defined by HUD regulations), post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability, including the co-occurrence of two or more of those conditions; the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual’s ability to live independently.

C. DOCUMENTING ELIGIBILITY

(See also Exhibit 2- HUD Homeless Definition and Documentation)

- a. Agencies receiving grant funding for PSH under the CoC program must document and maintain records related to participant eligibility and the services provided to participants. Each client file must include documentation of homeless status and other program eligibility criteria, and comply with HUD’s recordkeeping requirements. (Please refer to HUD’s order of priority for documentation in Section II, C. Documenting Eligibility, items a through e, of this manual.)
- b. In addition, for programs serving chronically homeless, documentation of chronic homelessness is required.  
Information on determining chronic homelessness may be found at:  
[Flowchart and Documentation Standards](#)  
HUD’s CH recordkeeping options and documentation checklist may be found at:  
[Chronic Homelessness Documentation Checklist](#)

D. PRIORITIZATION FOR PSH ASSISTANCE

BTG has adopted the orders of priority for PSH as established in [HUD Notice CPD-16-11](#). This Notice provides guidance to the CoC and recipients of CoC Program funding regarding the order in which eligible households should be served in all CoC Program-funded PSH and is summarized below. (This Notice must be referenced in its entirety for further details.)

- a. **Order of Priority in CoC Program-funded Permanent Supportive Housing Beds Dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing Prioritized for Occupancy by Persons Experiencing Chronic Homelessness.** For CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness, the following order of priority applies:

- (1) **First Priority** - Chronically Homeless Individuals and Families with the longest history of homelessness and with the most severe service needs. A chronically homeless individual or head of household as defined in CFR 578.3 for whom both of the following are true:
- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
  - ii. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section I.D.3. of this Notice for definition of severe service needs).
- (2) **Second Priority** - Chronically Homeless Individuals and Families with the longest history of homelessness. A chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which both of the following are true:
- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
  - ii. The CoC or CoC program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.
- (3) **Third Priority** - Chronically Homeless Individuals and Families with the most severe service needs. A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:
- i. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and
  - ii. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.
- (4) **Fourth Priority** - All Other Chronically Homeless Individuals and Families. A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:
- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is less than 12 months; and

- ii. The CoC or CoC program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

b. **Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness.** For eligibility in non-dedicated and nonprioritized PSH serving non-chronically homeless households, any household member with a disability may qualify the family for PSH.

- (1) **First Priority** - Homeless Individuals and Families with a disability with the most severe service needs.

An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for any period of time, including persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and has been identified as having the most severe service needs.

- (2) **Second Priority** - Homeless Individuals and Families with a disability with a long period of continuous or episodic homelessness. An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and had been living or residing in one of those locations for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months.

- (3) **Third Priority** - Homeless Individuals and Families with disability coming from places not meant for human habitation, safe havens, or emergency shelters.

An individual or family that is eligible for CoC Program-funded PSH who has been living in a place not meant for human habitation, a safe haven, or an emergency shelter. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution.

- (4) **Fourth Priority** - Homeless Individuals and Families with a disability coming from transitional housing.

An individual or family that is eligible for CoC Program-funded PSH who is coming from transitional housing, where prior to residing in the transitional housing lived on streets or in an emergency shelter, or safe haven. This priority also includes homeless individuals and homeless households with children with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and are

living in transitional housing—all are eligible for PSH even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing.

- b. All households served in CoC PSH projects must be referred through BTG’s Coordinated Entry System using its current prioritization method.
- c. There shall be no project-specific waiting lists or project-specific prioritization policies that exist outside of BTG CES.
- d. Recipients of CoC Program-funded PSH should follow the order of priority, as adopted by the CoC, while also considering the goals and any identified target populations served by the project.

E. STANDARDS FOR CoC PSH RENTAL ASSISTANCE

(See more information in [HUD Leasing and Rental Assistance: Focus on Rental Assistance](#))

The following standards shall be applied to PSH Rental Assistance projects:

- a. Long term rental assistance of more than 24 months may be provided.
- b. The following tenancy models are allowable through PSH Rental Assistance:
  - (1) Tenant-based rental assistance (TBRA) – Program participant identifies housing of their choice in the private rental market. The lease agreement is executed directly between the program participant the landlord. Rental assistance can be applied to a new unit should the participant move. Grant recipients administering TBRA may limit where the participants may live if it is necessary to facilitate the coordination of supportive services.
  - (2) Sponsor-based rental assistance (SBRA) – Lease agreement shall be between the sponsor and program participant. Sponsor agencies locate and rent housing units in the private market and then sublease these units to PSH program participants. (In this model, the sponsor may also own the unit(s).) If the program participant moves out, the sponsor may sublease it to the next eligible participant; may continue SBRA to support the participant in the new unit; or may sublet another unit in the community to the same or different eligible participant. The decision is ultimately the sponsor’s since the rental assistance stays with the sponsor.
  - (3) Project-based rental assistance (PBRA) – Rental assistance through this model is provided through a contract with the owner of the building who agrees to lease the subsidized unit(s) to the program participants. The program participant does not retain rental assistance if they move, instead the unit would be rented to the next eligible participant that would benefit from the PBRA.
- c. Initial lease. For project-based, sponsor-based, or tenant-based rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- d. Rental assistance funds may pay for unit rent; first and/or last month’s rent; security deposits (up to 2 months rent); property damage (up to 1 month rent, limited to one time per participant); vacancy payment (up to 30 days); and staff costs to carry out eligible activities.
- e. Participants are required to contribute towards rental costs, unless they have no income at all. Rents must be charged and be equal to the highest of:
  - (1) 30% of family’s monthly adjusted income;
  - (2) 10% of family’s gross income; or

- (3) The portion of the family's welfare assistance, if any, that is designated for the payment of rent.
- f. No fees may be imposed other than rent for projects which provide rental assistance. Projects which receive other types of assistance, such as leasing, may choose to impose an occupancy charge. Projects are not allowed to charge any type of program fees.
- g. Rental assistance awards are calculated based on the FMR for the applicable unit size. However, the provider is allowed to pay rents up to the rent reasonableness amount even if it is higher than the FMR. In this case, the provider must ensure they have sufficient funding to serve the contracted, projected number of program participants for the remainder of the grant term. (For example, the provider may locate lower cost rentals in other areas of the community to offset the higher rents.)
- h. Housing leased with CoC program funds, or for which rental assistance payments are made with CoC program funds, must meet the applicable housing quality standards (HQS) under 24 CFR 982.401.

F. STANDARDS FOR CoC LEASING

(See more information in [HUD Leasing and Rental Assistance: Focus on Leasing](#) )

The following standards shall be applied to PSH Leasing projects:

- a. Leasing means the leasing of property, or portions of the property, not owned by the recipient or project sponsor involved. The property may be used in providing transitional or permanent housing, or providing supportive services.
- b. In projects which receive leasing funds, the provider agency contracts for space from a landowner, and is primarily responsible for the housing or office space (if it is contracted to provide supportive services).
- c. Once the program participant is selected, the provider executes a sublease or occupancy agreement to formalize the program participant's rights in the housing, and to specify program expectations for continued occupancy in the housing.
- d. The sublease or occupancy agreement must be for one year and be automatically renewable upon expiration.
- e. Recipients and subrecipients are not required to impose occupancy charges on program participants as a condition of residing in the housing. However, if occupancy charges are imposed the following criteria shall apply:  
 The rent cost may not exceed the highest of:
  - (1) 30% of family's monthly adjusted income;
  - (2) 10% of family's gross income; or
  - (3) The portion of the family's welfare assistance, if any, that is designated for the payment of rent; and
 The provider shall ensure that:
  - (4) All participants are treated equally and consistently;
  - (5) The process for determining the amount of the charge is clearly outlined; and
  - (6) Specific calculation procedures are followed to ensure the participant is not overcharged.
- f. Leasing funds may be used to lease a structure to provide permanent housing, transitional housing, or stand-alone supportive services. There are no FMR limitation on structures, but rent reasonableness standards must be used to determine rents for structures in the area for a comparable space.

- g. Leasing funds may be used to pay rent for individual units to be used for transitional or permanent housing. When grants are used to pay rent for individual housing units, the rent paid must be reasonable in relation to rents being charged for comparable units, taking into account the location, size, type, quality, amenities, facilities, and management services. In addition, the rents may not exceed rents currently being charged for comparable units, and the rent paid may not exceed HUD-determined fair market rents.
- h. Program fees are not allowed. No other charges except rent or occupancy fees may be charged.
- i. If the rent does not include utilities (electricity, gas, and water), leasing funds cannot be used to pay for utilities. Participants can be required to pay for necessary utilities. If so, a utility allowance may be applied to the occupancy charge calculation.
- j. If electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds. If utilities are not provided by the landlord, these utility costs are an operating cost, except for supportive service facilities. If the structure is being used as a supportive service facility, then these utility costs are a supportive service cost.
- k. In addition to direct rent costs, other eligible leasing costs include security deposits (up to 2 months rent), and first and/or last month's rent of an individual unit.
- l. Leasing funds cannot be used to lease units or structures owned by the grant recipient, subrecipient, their parent, subsidiary or affiliated organization (unless an exception to the ownership for good cause is authorized by HUD).

G. STANDARDS FOR OPERATING COSTS

Grant funds may be used to pay the costs of the day-to-day operation of transitional and permanent housing in a single structure or individual housing units.

- a. Eligible costs:
  - (1) The maintenance and repair of housing;
  - (2) Property taxes and insurance;
  - (3) Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost);
  - (4) Building security for a structure where more than 50 percent of the units or area is paid for with grant funds;
  - (5) Electricity, gas, and water;
  - (6) Furniture; and
  - (7) Equipment.
- b. Ineligible costs:
 

Program funds may not be used for rental assistance and operating costs in the same project. Program funds may not be used for the operating costs of emergency shelter- and supportive service-only facilities. Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.

H. SUPPORTIVE SERVICES

(See also Exhibit 5: Supportive Services Overview)

Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants in accordance with 24 CFR § 578.53. In general, supportive services must be necessary to assist program participants obtain and maintain housing. PSH

projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project. Re-evaluation(s) shall be conducted not less than once annually to determine program participants' current service needs to retain housing, and shall adjust services accordingly.

#### IV.Exhibits

##### A. Exhibit 1: Eligibility Criteria Summary for BTG ESG and CoC Rapid Re-Housing

Exhibit 1: Eligibility Criteria Summary for BTG ESG and CoC Rapid Re-Housing				
Criterion	Initial Evaluation		Re-Evaluation	
	ESG – RRH 24 CFR §576.401(a)	CoC – RRH 24 CFR §578*	ESG – RRH 24 CFR §576.401(b)	CoC – RRH 24 CFR §578.37 (a)(1)(ii)(E)
<b>Homeless Eligibility</b>				
Literally homeless	✓	✓	n/a	n/a
Imminent risk of homelessness	n/a	n/a	n/a	n/a
Homeless under other Federal statutes	n/a	n/a**	n/a	n/a
Fleeing/attempting to flee domestic violence	✓	✓	n/a	n/a
Income Evaluation Required	n/a	n/a	✓	n/a
Need (amount and type of assistance)	✓	✓	✓	✓
Lacking Resources and Support Networks	n/a	n/a	✓	✓

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

\*\* For CoC-RRH assistance to be provided to persons defined as homeless under Category 3, the project must be located within the geographic area of a CoC that has received HUD approval to serve this population. No CoC in Hawaii has been approved.

\*\*\* Eligible only if also literally homeless

B. Exhibit 2: HUD Homeless Definition and Documentation

Exhibit 2: HUD Homeless Definition and Documentation			
Category	Definition	Required Document	Eligibility by Component
<b>Category 1 – Literally Homeless</b>	<p>Household lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <p>a. Has a primary nighttime residence that is a public or private place not meant for human habitation;</p> <p>b. Is living in a 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 and local government programs); OR</p> <p>c. Is exiting an institution where (s)he has 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</p>	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; or</li> <li>• Written referral by another housing or service provider; OR</li> <li>• Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li> </ul> <p>For individuals exiting an institution – one of the forms of evidence above AND:</p> <ul style="list-style-type: none"> <li>o Discharge paperwork or written/oral referral, OR</li> <li>o Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Housing</li> <li>• Transitional Housing</li> <li>• Rapid Re-Housing</li> <li>• Permanent Supportive Housing</li> </ul>
<b>Category 2 – Imminent Risk of Homelessness</b>	<p>Household will imminently lose their primary nighttime residence, provided that:</p> <p>a. Residence will be lost within 14 days of the date of application for assistance; AND</p> <p>b. No subsequent residence has been identified; AND</p> <p>c. Household lacks the resources or support networks needed to obtain other permanent housing</p>	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the household that they must leave; OR</li> <li>• For households leaving a hotel or motel – evidence that they lack the financial resources to stay; OR</li> <li>• A documented and verified oral statement; AND</li> <li>• Certification that no subsequent residence has been identified; AND</li> <li>• Self-certification or other written documentation that the household lacks the financial resources and support necessary to obtain permanent housing</li> </ul>	<ul style="list-style-type: none"> <li>• Prevention</li> <li>• Emergency Housing (if household will become Literally Homeless that night)</li> </ul>

**Exhibit 2: HUD Homeless Definition and Documentation (cont.)**

Category	Definition	Required Document	Eligibility by Component
<p align="center"><b>Category 3 – Homeless under other Federal Statutes</b></p>	<p>Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <p>(i) Are defined as homeless under the other listed federal statutes;</p> <p>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</p> <p>(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers.</p>	<ul style="list-style-type: none"> <li>• Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute, AND</li> <li>• Certification of no permanent housing in last 60 days; AND</li> <li>• Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; AND</li> <li>• Documentation of special needs or 2 or more barriers</li> </ul>	<p>Not applicable under Bridging the Gap homeless programs</p>

**Exhibit 2: HUD Homeless Definition and Documentation (cont.)**

Category	Definition	Required Document	Eligibility by Component
<p align="center"><b>Category 4 – Fleeing/ attempting to flee domestic violence</b></p>	<p>Any household who:</p> <ul style="list-style-type: none"> <li>a. Is fleeing, or is attempting to flee, domestic violence;</li> <li>b. Has no other residence; AND</li> <li>c. Lacks the resources or support networks to obtain other permanent housing</li> </ul>	<ul style="list-style-type: none"> <li>• For victim service providers:                             <ul style="list-style-type: none"> <li>o An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker</li> </ul> </li> <li>• For non-victim service providers:                             <ul style="list-style-type: none"> <li>o Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where safety is not jeopardized, the oral statement must be verified; AND</li> <li>o Certification by the individual or head of household that no subsequent residence has been identified; AND</li> <li>o Self-certification, or other written documentation, that the household lacks the financial resources and support to obtain other permanent housing.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Prevention</li> <li>• Emergency Housing</li> <li>• Transitional Housing</li> <li>• Rapid Re-Housing</li> <li>• Permanent Supportive Housing</li> </ul>

C. Exhibit 3: Eligible Costs Summary

Exhibit 3: Eligible Costs Summary			
	ESG-RRH 24 CFR §576.104-106	CoC-RRH 24 CFR §578.37(1)(ii)	CoC PSH 24 CFR §578.37(1)(i)
<b>Rental Assistance <sup>1</sup></b>	<ul style="list-style-type: none"> <li>• Short-term rental assistance (up to 3 months)</li> <li>• Medium-term rental assistance (4 to 24 months)</li> <li>• Rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears)</li> </ul>	<ul style="list-style-type: none"> <li>• Short-term rental assistance (up to 3 months)</li> <li>• Medium-term rental assistance (4 to 24 months)</li> </ul>	<ul style="list-style-type: none"> <li>• Long term rental assistance of more than 24 months</li> </ul>
<b>Rental Assistance Type</b>	<ul style="list-style-type: none"> <li>• Tenant-based rental assistance</li> <li>• Project-based rental assistance</li> </ul>	<ul style="list-style-type: none"> <li>• Tenant-based rental assistance only</li> </ul>	<ul style="list-style-type: none"> <li>• Tenant-based rental assistance</li> <li>• Sponsor-based rental assistance</li> <li>• Project-based rental assistance</li> </ul>
<b>Eligible Costs</b>	<p><b>Housing Relocation and Stabilization Services</b></p> <p><b>Financial assistance costs:</b></p> <ul style="list-style-type: none"> <li>• Rental application fees</li> <li>• Security deposits (up to 2 months)</li> <li>• Last month’s rent</li> <li>• Utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears)</li> <li>• Moving costs</li> </ul> <p><b>Service costs:</b></p> <ul style="list-style-type: none"> <li>• Housing search and placement</li> <li>• Housing stability case management</li> </ul>	<p><b>Financial assistance (24 CFR §578.51 eligible under rental assistance):</b></p> <ul style="list-style-type: none"> <li>• Resident rents (calculated per §578.77)</li> <li>• Security deposits (up to 2 months)</li> <li>• First and last month’s rent</li> <li>• Property damage due to actions of the program participant (up to 1 month’s rent)</li> <li>• Vacancy (up to 30 days)</li> </ul> <p><b>Supportive services (24 CFR § 578.53) :</b></p> <ul style="list-style-type: none"> <li>• Case management</li> <li>• Child care</li> <li>• Education services</li> <li>• Employment assistance and job training</li> <li>• Food</li> </ul>	<p><b>Financial assistance (24 CFR §578.51 eligible under rental assistance):</b></p> <ul style="list-style-type: none"> <li>• Resident rents (calculated per §578.77)</li> <li>• Security deposits (up to 2 months)</li> <li>• First and last month’s rent</li> <li>• Property damage due to actions of the program participant (up to 1 month’s rent)</li> <li>• Vacancy (up to 30 days)</li> </ul> <p><b>Supportive services (24 CFR § 578.53) :</b></p> <ul style="list-style-type: none"> <li>• Case management</li> <li>• Child care</li> <li>• Education services</li> <li>• Employment assistance and job training</li> <li>• Food</li> </ul>

Exhibit 3: Eligible Costs Summary			
	<ul style="list-style-type: none"> <li>• Mediation</li> <li>• Legal services</li> <li>• Credit repair</li> </ul>	<ul style="list-style-type: none"> <li>• Housing search and counseling services, including mediation, credit repair, and payment of rental application fee</li> <li>• Legal services</li> <li>• Life skills training</li> <li>• Mental health services</li> <li>• Moving costs</li> <li>• Outpatient health services</li> <li>• Outreach services</li> <li>• Substance abuse treatment services</li> <li>• Transportation</li> <li>• Utility deposits</li> </ul>	<ul style="list-style-type: none"> <li>• Housing search and counseling services, including mediation, credit repair, and payment of rental application fee</li> <li>• Legal services</li> <li>• Life skills training</li> <li>• Mental health services</li> <li>• Moving costs</li> <li>• Outpatient health services</li> <li>• Outreach services</li> <li>• Substance abuse treatment services</li> <li>• Transportation</li> <li>• Utility deposits</li> </ul>

<sup>1</sup> [CoC Program Rent Determination Tools](#)

D. Exhibit 4: Rental Assistance Overview

<b>Exhibit 4: Rental Assistance Overview</b>			
	<b>ESG-RRH Rental Assistance 24 CFR §576.106</b>	<b>CoC-RRH Rental Assistance 24 CFR §578.51</b>	<b>CoC-PSH Rental Assistance 24 CFR §578.51</b>
<b>Fair Market Rent (FMR) <sup>1</sup></b>	Rental assistance may cover up to the FMR for a unit.	N/A	N/A
<b>Rent Reasonableness <sup>2</sup></b>	Units must comply with HUD’s rent reasonableness standards.	Rent reasonableness is the applicable rent standard. Unit rents can exceed FMR, but must NOT exceed rent reasonableness.	Allowed to pay rents up to the rent reasonableness amount even if it is higher than the FMR. In this case, the provider must ensure they have sufficient funding to serve the contracted, projected number of program participants for the remainder of the grant.
<b>Lease Requirements <sup>3</sup></b>	<ul style="list-style-type: none"> <li>• A written lease between the owner and the program participant is required for TBRA and PBRA.</li> <li>• For program participants living in housing with PBRA, the lease must have an initial term of one year. There is no minimum lease period for TBRA.</li> <li>• The only exception to the written lease requirement is in the case of rental assistance provided solely for rental arrears.</li> </ul>	Program participants receiving TBRA must sign a lease of at least one year that is renewable (for a minimum term of one month) and terminable only for cause.	<ul style="list-style-type: none"> <li>• For project-based, sponsor-based, or tenant-based rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause.</li> <li>• The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.</li> </ul>

**Exhibit 4: Rental Assistance Overview (Cont.)**

<p><b>Housing Standards <sup>4</sup></b></p>	<p>All ESG funded housing must pass HUD <b>Habitability</b> Standards (24 CFR §576.403(c)). <sup>4</sup></p>	<p>Units must meet applicable HUD Housing <b>Quality</b> Standards (24 CFR §578.75(b)).</p> <ul style="list-style-type: none"> <li>• Units must be physically inspected before providing any CoC assistance.</li> <li>• Assistance will not be provided for units that fail to meet standards, unless deficiencies are corrected within 30 days, and provider verifies corrections have been made satisfactorily.</li> <li>• Inspection frequency must be at annually during the period in which the units are receiving assistance.</li> <li>• PHA-owned units must be inspected by an entity that is not the PHA.</li> </ul>	<p>Units must meet applicable HUD Housing <b>Quality</b> Standards (24 CFR §578.75(b)).</p> <ul style="list-style-type: none"> <li>• Units must be physically inspected before providing any CoC assistance.</li> <li>• Assistance will not be provided for units that fail to meet standards, unless deficiencies are corrected within 30 days, and provider verifies corrections have been made satisfactorily.</li> <li>• Inspection frequency must be at annually during the period in which the units are receiving assistance.</li> <li>• PHA-owned units must be inspected by an entity that is not the PHA.</li> </ul>
--	--	--	--

<sup>1</sup> [Hawaii FY2020 Fair Market Rent Summary](#)

<sup>2</sup> [Sample Rent Reasonableness Checklist](#)

<sup>3</sup> [Sample Lease Agreements](#)

<sup>4</sup> For more details, see [HUD ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing](#), and Appendix A - “Comparison of ESG Minimum Standards for Emergency Shelter and Permanent Housing and HQS.”

Note: Recipients may establish standards more stringent than the ESG program’s minimum standards, or may allow the subrecipient to establish such standards, as long as all HUD-required standards are also met. For recipients that intend to apply more stringent standards, these standards should be described in a written policy to ensure that all individuals responsible for implementing the policy have access to consistent guidance.

E. Exhibit 5: Supportive Services Overview

<b>Exhibit 5: Supportive Services Overview*</b>		
	<b>ESG-RRH 24 CFR §576.105</b>	<b>CoC-RRH and PSH 24 CFR §578.53</b>
<b>Services*</b>	Supportive services are limited to housing relocation and stabilization services outlined in 24 CFR §576.105(b)(1-2).	Supportive services include a wide range of services outlined in 24 CFR §578.53(a-e).
<b>Limit on Service Provision</b>	Housing stability case management assistance may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the program participant is living in permanent housing.	Supportive services may be provided until 6 months after rental assistance stops.

<b>Exhibit 5: Supportive Services Overview*</b>		
	<b>ESG-RRH 24 CFR §576.105</b>	<b>CoC-RRH and PSH 24 CFR §578.53</b>
<b>Case Management Requirement</b>	<p>The rapid re-housing assistance must be provided in accordance with requirements in 24 CFR §576.105(b)(2), housing stability case management, including:</p> <ul style="list-style-type: none"> <li>• Using the coordinated entry system to evaluate RRH applicants;</li> <li>• Conducting the initial evaluation required under §576.401(a)</li> <li>• Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;</li> <li>• Monitoring and evaluating program participant progress;</li> <li>• Providing information and referrals to other providers;</li> <li>• Developing an individualized housing and service plan, including permanent housing stability;</li> <li>• Conducting re-evaluations required under §576.401(b).</li> </ul> <p>At a minimum, program participants must attend monthly case management meetings.</p>	<p>Eligible activities described in 24 CFR §578.53 include:</p> <p>Case management services and activities:</p> <ul style="list-style-type: none"> <li>• Counseling;</li> <li>• Developing, securing, and coordinating services;</li> <li>• Using the coordinated entry system</li> <li>• Obtaining federal, State, and local benefits;</li> <li>• Monitoring and evaluating program participant progress;</li> <li>• Providing information and referrals to other providers;</li> <li>• Providing ongoing risk assessment and safety planning with victims of</li> <li>• domestic violence, dating violence, sexual assault, and stalking; and</li> <li>• Developing an individualized housing and service plan.</li> </ul> <p>Other eligible Supportive Services include: Annual assessment of service needs; one-time assistance with moving costs; child care; educational services; employment assistance/job training; food; housing search and counseling services; legal services; life skills training; mental health and outpatient health services; outreach; substance abuse treatment; transportation; utility deposits; and direct provision of services.</p> <p>Note: At a minimum, CoC <b>RRH</b> program participants must attend monthly case management meetings 24 CFR §578.37(a)(1)(ii)(F).</p>

\*Note: While CoC funding may be used to fund all CoC supportive services listed in 24 CFR §578.53, the CoC may develop written policies and procedures that limit the services available to program participants in order to align CoC-funded RRH programs with ESG-funded RRH programs.

F. Exhibit 6: Written Standards

Exhibit 6: Written Standards		
	ESG-RRH 24 CFR §576.105	CoC-RRH 24 CFR §578.37
<b>Written Standards</b>	<p>Recipients and subrecipients must develop and implement written standards for providing ESG RRH assistance (24CFR §576.400(e)), including:</p> <ul style="list-style-type: none"> <li>• Determining and prioritizing which eligible families and individuals will receive RRH assistance</li> <li>• Determining the amount or percentage of rent and utilities each program participant must pay</li> <li>• Determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time</li> </ul>	<p>Recipients and subrecipients must establish and consistently follow policies and procedures established for:</p> <ul style="list-style-type: none"> <li>• Determining and prioritizing which eligible families and individuals will receive RRH assistance</li> <li>• Determining the amount or percentage of rent each program participant must pay</li> <li>• Determining the maximum amount or percentage of rental assistance that a program participant may receive</li> <li>• Determining the maximum number of months that a program participant may receive rental assistance</li> <li>• Determining the maximum number of times that a program participant may receive rental assistance</li> <li>• Determining the extent to which a program participant must share the cost of rent</li> </ul>

G. Exhibit 7: Required Identification Documents for Tenancy, ESG RRH & CoC RRH/PSH

Exhibit 7: Required Identification Documents for Tenancy* ESG RRH and CoC RRH and PSH Programs	
<b>Verification of Legal Identity (Adults)<sup>1</sup></b>	<p>Options (must be original and show name and date of birth):</p> <ul style="list-style-type: none"> <li>• Current, valid driver's license</li> <li>• Current U.S. passport</li> <li>• Certificate of birth, naturalization papers</li> <li>• U.S. military discharge (DD 214)</li> <li>• Current employer identification card</li> </ul>
<b>Verification of Legal Identity (Children)<sup>1</sup></b>	<p>Options (must be original and show name and date of birth):</p> <ul style="list-style-type: none"> <li>• Certificate of birth</li> <li>• Adoption papers</li> <li>• Custody agreement</li> <li>• Health and Human Services ID</li> <li>• Certified school records</li> </ul>

**Exhibit 7: Required Identification Documents for Tenancy\* (cont.)  
ESG RRH and CoC RRH and PSH Programs**

<p align="center"><b>Social Security Number<sup>1</sup></b></p>	<p>Options (must be original document for each member of household):</p> <ul style="list-style-type: none"> <li>• Social Security card</li> <li>• Original document issued by a federal or state government agency which contains the name, SSN, and other identifying information of the individual</li> <li>• Driver’s license with SSN</li> <li>• Identification card issued by a medical insurance provider, or by an employer or trade union.</li> <li>• Earnings statements on payroll stubs</li> <li>• Bank statement</li> <li>• Tax Form 1099</li> <li>• Benefit award letter</li> <li>• Retirement benefit letter</li> <li>• Life insurance policy</li> <li>• Court records</li> </ul>
<p align="center"><b>Other Tenancy Requirements</b></p>	<ul style="list-style-type: none"> <li>• Federal guidelines state that nonprofit charitable organizations that are recipients of any CoC or ESG Program funds are not required to verify the immigration status of applicants for federal, state, or local public benefits and assistance, unless required by the funding entity.</li> <li>• Other federal housing programs such as public housing, Housing Choice Voucher Program, Project-Based Voucher Program, Section 8, etc., are restricted to immigrants. If transitioning to any of these programs, each member of the household must provide a certification that identify them as a U.S. citizen, a U.S. national, an eligible non-citizen, or an ineligible noncitizen. Documents will be verified by the applicable housing program.</li> <li>• CoC and ESG RRH programs are open to immigrants (qualified aliens) as defined in 8 U.S.C. 1641 without restrictions. There are certain types of federal assistance that are not subject to the Personal Responsibility and Work Opportunity Act of 1996 restrictions on access to public benefits based on immigration status. This includes activities that: (1) deliver in-kind services at the community level, (2) are necessary for the protection of life or safety, and (3) do not condition the provision of assistance on the potential program participant’s income or resources.</li> </ul>

**Note:**

ESG and CoC Interim Rules do not require identification as a condition to apply for or receive homeless assistance. HF practices seek to remove unnecessary barriers to receiving assistance, including requiring identification. However, providers may request identification and use this information to determine the most appropriate housing placement. This practice should not be used to screen out an otherwise eligible individual or family for entry into a program.

\*References:

[HUD Occupancy Handbook, Appendix 3 – Acceptable Forms of Verification;](#)

[National Housing Law Project, “Immigration Requirements: Other Assistance Programs for Housing and Homelessness”](#)

[The Personal Responsibility and Work Opportunity Act \(PRWOA\) of 1996 and HUD’s Homeless Assistance Program Fact Sheet](#)

**Exhibit 8: Annual Income: 24 CFR § 5.609\*  
ESG RRH and CoC RRH and PSH Programs**

**a. Annual income means all amounts, monetary or not, which:**

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in paragraph (c) of this section.
- Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

**b. Annual income includes, but is not limited to:**

- The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
- The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family;
- Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in paragraph (b)(2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD;
- The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount (except as provided in paragraph (c)(14) of this section);
- Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except as provided in paragraph (c)(3) of this section);

**Exhibit 8: Annual Income: 24 CFR § 5.609\* (cont.)**  
**ESG RRH and CoC RRH and PSH Programs**

- Welfare assistance payments.
  - (i) Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:
    - (A) Qualify as assistance under the TANF program definition at 45 CFR 260.31; and
    - (B) Are not otherwise excluded under paragraph (c) of this section.
  - (ii) If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:
    - (A) The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus
    - (B) The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.
- Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling;
- All regular pay, special pay and allowances of a member of the Armed Forces (except as provided in paragraph (c)(7) of this section).
- For section 8 programs only and as provided in 24 CFR 5.612, any financial assistance, in excess of amounts received for tuition and any other required fees and charges, that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or from an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except that financial assistance described in this paragraph is not considered annual income for persons over the age of 23 with dependent children. For purposes of this paragraph, "financial assistance" does not include loan proceeds for the purpose of determining income.

\*For more information on [Annual and Adjusted Income](#), refer to 24 CFR § 5.609-11.