

#### Racine CoC Prevention Standards, Policies, & Procedures

## 1. Description

Homelessness prevention assistance includes rental assistance and housing relocation and stabilization services necessary to prevent an individual or family from moving into an emergency shelter, the streets, or a place not meant for human habitation. All providers agree to attend CoC and ESG required trainings and participate in community meetings to provide consistent services across the Continuum that are based on best practices. In addition, all providers must coordinate with other ESG funded providers to ensure effective and quality service delivery, including participation in CoC committees.

# 2. Eligibility

- 2.1. Participants must meet one of the following categories of HUD's Homeless Definition under CFR §576.2, AND have an annual income below **30%** of the county median income:
  - 2.1.1. Category 2\* (Imminent Risk of Homelessness)
  - 2.1.2. Category 3 (Homeless Under Other Federal Statutes)
  - 2.1.3. Category 4\* (Fleeing/Attempting to Flee Violence, and not living in a place described in Category 1)
  - \* Category 2 and Category 4 participants must have no other residence <u>AND</u> lack the resources and support networks to obtain other permanent housing.

OR

- 2.2. Individuals and families who do not meet the definition of "homeless" under any of the categories established in the HUD Homeless Definition final rule and are "at risk of homelessness" under the McKinney-Vento Act, may receive homeless prevention assistance.
  - 2.2.1. Participants must meet one of the three categories of HUD's At Risk of Homelessness Definition under CFR §576.2, <u>AND</u> have an annual income below **30%** of county median income:
    - 2.2.1.1. Category 1\*
    - 2.2.1.2. Category 2 (Children/youth who do not qualify as homeless under the homeless definition in §576.2 but qualify as homeless under another Federal statute)
    - 2.2.1.3. Category 3 (Children/youth and their families who do not qualify as homeless under the homeless definition in §576.2, but who do qualify as homeless under Section 725(1) of the McKinney-Vento Homeless Assistance Act)
  - \* Category 1 participants must lack sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in Category 1 of the homeless definition.

## 3. Participant Prioritization Requirements for Financial Assistance

- 3.1. All individuals and families must meet the minimum HUD requirements for eligibility for homeless prevention. Further, all participants must meet one of the following:
  - 3.1.1. Experienced homelessness in an emergency shelter, safe haven or place not meant for habitation within the past five years; or
  - 3.1.2. Have a household of five or more; or
  - 3.1.3. Live in or need an accessible housing unit; or
  - 3.1.4. Live in subsidized unit; or
  - 3.1.5. Have a criminal background; or
  - 3.1.6. Have prior eviction
- 3.2. The Racine COC will use a shared prioritization screening and scoring tool available in HMIS that will target participants with the most barriers to housing. This tool will be used for individuals and households that meet the initial eligibility requirements listed above.
- 3.3. Participants with the highest score at the end of an agency's intake period will be prioritized to receive financial assistance.

### 3.4. VAWA Participant Safety

- 3.4.1. 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.
  - 3.4.1.1. 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.
  - 3.4.1.2. 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.
  - 3.4.1.3. 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.
  - 3.4.1.4. Program participants requesting an emergency transfer will be prioritized above any other households for open units.
  - 3.4.1.5. Agencies participating in Coordinated Entry must accept emergency transfers as they have available units that are deemed safe.

## 4. Prioritization Scoring Tool

Further information regarding prioritization and the scoring tool is found in the Coordinated Entry (CE) Standards.

#### 5. Minimum Standards for Financial Assistance

- 5.1. Financial assistance includes the following: rental application fees, security deposits, last month's rent, utility deposits and moving costs. There is no limit on the total amount of financial assistance a household may receive.
- 5.2. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.
  - 5.2.1. Under no circumstances can a recipient receive more than **24-months** of rental assistance in a **36-month period**. Individual agencies may have policies that permit full payment of rent or a decreasing payment standard.
  - 5.2.2. One hundred percent (100%) of rent, utilities, and other eligible financial costs may be paid out of ESG funds.
  - 5.2.3. There is no limit on the number of times a household may receive financial assistance with ESG funds as long as compliant with #5.2.1
- 5.3. Eligibility and types/amounts of assistance must be re-evaluated not less than once every **3-months**. At a minimum, each re-evaluation must establish and document:
  - 5.3.1. The program participant does not have an annual income that exceeds thirty percent (30%) of county median income.
  - 5.3.2. The program participant lacks sufficient resources and support networks necessary to retain housing without prevention assistance.
- 5.4. Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
- 5.5. Financial assistance will be distributed in a way to ensure that programs have funds available throughout the grant period.
- 5.6. Programs must use the Racine CoC Coordinated Entry Prevention Assessment tools to determine the duration and amount of assistance. The tools do not dictate the amount of assistance that each household receives but guides the case manager and client to determine the appropriate amount of assistance for each household.
  - 5.6.1. All clients are assessed to determine initial need and create a budget to outline planned need for assistance.
  - 5.6.2. Agencies cannot set organizational maximums or minimums but must rely on the CoC wide tools to determine household need.
  - 5.6.3. Through case management, client files are reviewed monthly to ensure that

- planned expenditures for the month validate financial assistance request.
- 5.6.4. The Racine COC expects that households will receive the minimum amount of assistance necessary to stabilize in housing.
- 5.6.5. Participant share will be determined by use of common assessment and budgeting tools approved through the Racine COC. These tools will determine the monthly assistance amount and participant contribution. Participants will work with their case manager to develop their individual housing plan based on participant goals and shared goals for achieving housing stability. Case managers will use the housing plan to determine the participant contribution based on monthly income. Participants are expected to contribute a portion of their income based on budgeting to ensure housing stability. Financial assistance is available for households with zero income.

## 6. Minimum Standards for Housing Relocation and Stabilization Services

- 6.1. Housing Relocation and Stabilization Services include the following:
  - 6.1.1. housing search and placement,
  - 6.1.2. housing stability case management,
  - 6.1.3. mediation,
  - 6.1.4. legal services, and
  - 6.1.5. credit repair.
- 6.2. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.
- 6.3. Housing Stabilization Services may be provided for up to **24-months** in a **36-month** period with or without financial assistance.
- 6.4. Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
- 6.5. Homelessness prevention participants receiving more than one-time assistance, must have an initial home visit when first approved for assistance and subsequent house visits with each recertification every three **3-months**. It is expected that case managers will conduct office visits with homelessness prevention participants between home visits, at least once per month. Case managers and program managers are encouraged to provide more than the minimum required services through case management.

#### 7. APPEAL

Any agency or person wishing to appeal action or inaction under these standards should first attempt to resolve the situation using the grievance policies and procedures of the individual agency. If further appeal is desired, a request can be to the Lead Agency for the grant within

**30-days** of the last action taken at agency level. The Lead Agency will convene an appeal committee of at least three **(3)** agencies to hear the appeal.

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