# IN-502 RAPID RE-HOUSING WRITTEN STANDARDS

Indiana Balance of State Continuum of Care

Updated May 19, 2022

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#### Overview

In accordance with HUD regulations (24 CFR Part 578), the Indiana Balance of State Continuum of Care (IN BoS CoC) has developed, in consultation with ESG recipients and Rapid Re-Housing providers, the following written standards for the provision of rapid re-housing (RRH) assistance. The standards contained herein apply to Rapid Re-Housing projects funded by the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program, those located in all jurisdictions covered by the IN BoS CoC, as well as those funded by HUD Emergency Solutions Grant (ESG) funds.

Rapid Re-Housing is an intervention that connects families and individuals experiencing homelessness to permanent housing that includes time-limited financial assistance and targeted supportive services. The three core components of Rapid Re-Housing programs are: 1) assistance with housing identification, 2) rent and move-in financial assistance, and 3) case management and housing stabilization services tailored to the needs of the household. RRH is a housing first<sup>1</sup>, no-barrier intervention with no preconditions to enrollment other than homeless status (See HUD Definition of Homelessness – Also included in Appendix 3). The level of case management and financial assistance is based on a progressive engagement model<sup>2</sup> where the minimum amount of assistance is provided before increasing support to meet the household's needs.

For administrative ease and when possible, the IN BoS CoC has developed program requirements for RRH for both the CoC and ESG programs. However, some significant differences remain in eligible costs and requirements for RRH activities administered under the ESG and CoC programs due to different requirements in 24 CFR 578 (CoC) and 24 CFR 576 (ESG). For more information on how RRH under the CoC Program differ from RRH under the ESG program, please review HUD's ESG vs. CoC Guide or contact the IHCDA Community Services Grants Team at communityservices@ihcda.in.gov.

#### Role of Rapid Re-Housing within the Homeless Services System

Rapid Re-Housing has an important role in the homeless services system including:

- reducing the amount of time a household experiences homelessness by focusing on quickly resolving the
  experience of homelessness;
- increasing the number of households exiting from homelessness; and
- ensuring that permanent supportive housing interventions are reserved for households with the greatest service needs who would otherwise be unable to maintain housing.

#### Population-Specific Rapid Re-Housing Projects

Indiana has received HUD Continuum of Care awards to serve survivors of domestic violence and human trafficking and may have slight variation in the guidelines. The Domestic Violence Rapid Re-Housing Projects (DV Projects) is designed to meet the specific needs of domestic violence, dating violence, and human trafficking survivors.<sup>3</sup> It establishes a systemic collaboration between domestic violence, human trafficking and housing providers that will enhance survivor access to housing resources and provide on-going trauma-informed, victim-centered support services necessary to achieve financial and housing stability. Like traditional Rapid Re-Housing programs, the DV Projects are an intervention designed to help survivors quickly exit homelessness, return to housing in the community, and not become homeless again in the near term. The DV Projects are a specialized collaboration

<sup>&</sup>lt;sup>1</sup> See *Definition of Terms* in Appendix 2

<sup>&</sup>lt;sup>2</sup> See *Definition of Terms* in Appendix 2

<sup>&</sup>lt;sup>3</sup> The term, "Domestic Violence," includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).

between domestic violence, human trafficking, and homeless providers that leverages the expertise of homeless providers to quickly identify and secure safe, appropriate housing, while ensuring that domestic violence and human trafficking survivors have the skilled support and case management that will most effectively address their unique needs.

**Trauma-informed, Survivor-centered**: The use of a trauma-informed approach<sup>4</sup> requires a basic understanding of trauma and designing services to acknowledge the impact of violence and trauma on survivors' lives and behavior. It is sensitive, respectful, and consciously avoids re-traumatization. A survivor-centered approach focuses on the needs and concerns of the survivor while encouraging them to be engaged participants in the process. It empowers them to make their own choices about housing and services.

## Participant Eligibility:

- CoC participants must meet HUD's <u>Category 1, 2 or 4 definition of homeless</u> (See Appendix 3) for CoC Rapid Re-Housing. ESG participants are required to meet HUD's Category 1 (literally homeless) or 4 (fleeing domestic violence)<sup>5</sup>.
- ESG participants must have household income of less than or equal to 30% Area Median Income (AMI). This does not apply for the initial intake but is enforced when income is reassessed during interim-evaluations. The 30% AMI threshold does not apply to CoC participants during any eligibility period.
- Households have been referred to RRH from the Coordinated Entry system.
- Recipients and sub-recipients must conduct interim evaluations at least every 12 months of program
  participants receiving RRH assistance.<sup>7</sup> For ESG Subrecipients who also utilize <u>homelessness prevention</u> as
  part of their RRH project, they must conduct interim evaluations every 90 days to determine continued
  eligibility. In addition, if at any time during assistance, the service provider is made aware of a change in
  status, an evaluation must be conducted to determine continued eligibility.<sup>8</sup>
- Households with no income at initial evaluation and/or re-evaluation are eligible.
- As indicated by HUD, households who are eligible for permanent supportive housing (PSH) and awaiting PSH
  placement may receive RRH assistance and will retain their homeless and, if applicable, chronically homeless
  status. Clients who are awaiting PSH placement must have disability documentation.
- The CoC Program Notice of Funding Opportunity (NOFO) 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 NOFO and regulatory requirements.

<sup>&</sup>lt;sup>4</sup> See *Definition of Terms* in Appendix 2

<sup>&</sup>lt;sup>5</sup> Per <u>576.104</u> – families in category 4 must also be living in an emergency shelter or otherwise literally homeless "this assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the 'homeless' definition in § <u>576.2</u> or who meet the criteria under paragraph (4) of the 'homeless' definition and live in an emergency shelter or other place described in paragraph (1) of the 'homeless' definition."

<sup>&</sup>lt;sup>6</sup> As per <u>576.401(b)</u> re-evaluations for RRH assistance needs to be not less than annually and at that point participants may have incomes no greater than 30% of AMI.

<sup>&</sup>lt;sup>7</sup> Service providers may establish an organizational policy that allows for more frequent re-evaluations or when a change in income is identified

<sup>&</sup>lt;sup>8</sup> Please note that ESG-CV RRH Guidelines may have been changed to prevent, prepare for, and/or respond to the COVID-19 pandemic; all subrecipients should refer to the ESG-CV Desk Guide for guidance pertaining to that program.

### Participant Prioritization:

Clients with the highest vulnerability, determined by the VISPDAT<sup>9</sup> assessment, and who will be able to sustain housing should be prioritized for RRH. However, no clients should be excluded from eligibility and may continue with case management services until appropriate housing becomes available. Regions in the CoC may write a separate policy for prioritization based on the needs within their region.

# RRH Program Standards:

- Permanent housing is the immediate goal. The individual or family is provided with rapid access to
  permanent housing with minimal pre-conditions that could serve as barriers. For example: good credit or
  good rental history cannot be required screening criteria.
- RRH recipients and sub-recipients must use a progressive engagement model; this practice supports using the least intense intervention to help resolve homelessness for the individual or family. Providers are to add more assistance only as necessary if the less-intense intervention is not successful.
- Participants can receive short-term rental assistance for up to 3 months, or medium-term rental assistance lasting from 4-24 months. In some cases, clients may receive rental assistance for up to 24 months. Clients who also have a documented disability and are waiting a PSH unit can receive rental assistance for up to 24 months. Under certain circumstances clients that could benefit from rental assistance from 12-24 months may be considered on a case-by-case basis providing this keeps them from experiencing homelessness and will help them be stably housed at the end of the rental assistance.
- For all COC projects, rental assistance must be tenant based and participants must be the tenant on a lease for a term of twelve (12) months that is renewable and is terminable only for cause. ESG does permit project-based rental assistance in addition to tenant-based rental assistance. For further clarification and explanation, please contact IHCDA's Community Services division at communityservices@ihcda.in.gov.
- Participants in RRH are eligible to receive supportive services alone or in combination of eligible supportive services and rental assistance.
  - CoC participants are eligible for a wide range of services outline in <u>24 CFR 578.53</u> and supportive services may be provided for up to 6 months after rental assistance stops.
  - ESG participants are eligible for supportive services limited to housing relocation and stabilization services. Housing stability case management assistance cannot exceed 30 days during the period in which the program participant is seeking permanent housing and cannot exceed 24 months during the period in which the program participant is living in permanent housing (24 CFR 576.105(b)(2)).
- In addition to receiving tenant based rental assistance, RRH participants may also receive additional financial assistance.
  - CoC participants are eligible for:
    - Security deposits (not to exceed the amount of 2 months of rent)
    - First and last month's rent
    - Property damage

<sup>&</sup>lt;sup>9</sup> The VI-SPDAT stands for Vulnerability Index – Service Prioritization Decision Assistance Prescreen Tool. The tool was developed as a pre-screening tool that prioritize which clients should be recommended for housing and other support intervention.

- Total property damage payments during a single enrollment in the RRH program may not exceed an amount equal to one month of the participant household's rent. This is paid to the property owner on behalf of the program participant.
- Damages are only eligible to be paid if the security deposit collected did not exceed one month initially or was a fixed amount that did not exceed one month of rent. Damages payments are only made after the participant has left the unit.
- o ESG participants are eligible for:
  - Rental application fees
  - Security deposits (not to exceed the amount of 2 months of rent)
  - Last month's rent
  - Utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears)
  - Moving costs
  - Amounts owed for breaking a lease to effect an emergency transfer<sup>10</sup>
- Limitations on amount, frequency and duration of assistance:
  - Rapid Re-Housing recipients and sub-recipients must require the program participant to meet with a
    case manager not less than once per month to assist the program participant in maintaining longterm housing stability.
  - Participants must be re-evaluated at least once every 12 months to determine the need for
    continued assistance. This requirement applies to both supportive services and rental assistance.
    Through each re-evaluation, the recipient or sub-recipient must determine that the continuation of
    assistance is necessary to avoid literal homelessness.
  - Participants that have income and are able to contribute towards rent <u>must</u> pay a portion of their rent. The percentage of assistance may vary as it is based on the needs of the participant. Progressive payment increases should be used, if needed. When considering the amount of rental assistance, agencies must determine the amount of client contribution, the frequency of adjustment, and the duration of the assistance. Agencies should also keep in mind that rental assistance for ESG-RRH may cover up to the Fair Market Rent (FMR) for a unit while CoC RRH rental assistance can be based on rent reasonableness (RR) as the applicable rent standard. It is expected that the participant will pay 100% of their rent at program completion. To determine FMR<sup>11</sup>, please visit HUD's Fair Market Rent website at <a href="https://www.huduser.gov/portal/datasets/fmr.html">https://www.huduser.gov/portal/datasets/fmr.html</a>. Each agency must have a written policy on the Client Contribution Program Structure that is administered fairly and consistently for all participants. The subsidy plan then must be documented in each client's file. (See Appendix 3 for Sample Client Contribution Program Structures)
  - If upon re-assessment it is determined that a higher amount of assistance or a longer duration of
    assistance is necessary to avoid literal homelessness, then the provider can adjust their level of
    assistance to ensure the household is not re-entering homelessness.
  - Participants may be eligible for Rapid Re-Housing assistance for multiple episodes of literal homelessness based on their needs. To ensure the efficient use of resources, recipients and sub-

<sup>&</sup>lt;sup>10</sup> If a program participant receiving short- or medium-term rental assistance under § 576.106 meets the conditions for an emergency transfer under 24 CFR 5.2005(e), ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance under § 576.106.

<sup>&</sup>lt;sup>11</sup> The applicable FMR is based on the project year from which funding is being utilized.

recipients may establish a maximum amount or number of times that a program participant may receive Rapid Re-Housing assistance.

- Rental assistance agreement. The recipient or subrecipient may make rental assistance payments only to an owner with whom the recipient or subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under State or local law to commence an eviction action against the program participant. Each rental assistance agreement that is executed or renewed on or after December 16, 2016 must include all protections that apply to tenants and applicants under 24 CFR part 5, subpart L, as supplemented by § 576.409, except for the emergency transfer plan requirements under 24 CFR 5.2005(e) and 576.409(d). If the housing is not assisted under another "covered housing program", as defined in 24 CFR 5.2003, the agreement may provide that the owner's obligations under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), expire at the end of the rental assistance period."
- No unit may be assisted with rental assistance until the unit has been inspected.
  - All units paid for with COC rental assistance funds must meet HUD's Housing Quality Standards (HQS) (§ 578.75(b)) and lead-based paint requirements (24 CFR Part 35) prior to expending COC funds on that unit. 12 All units must additionally meet state and local codes.
    - The recipient or subrecipient must physically inspect all units prior to expending CoC funds and must continue to do so annually throughout the grant period (see <u>HUD Inspection</u> <u>Checklist</u>). The annual review can take place during lease renewal.
    - Inspectors do not need to be certified.
    - The owner of the unit has 30 days to address and correct any deficiencies in the unit.
    - The recipient or subrecipient must maintain documentation of compliance with HQS, including inspection reports.
  - Per CFR 576.403(c), ESG subrecipients may use minimum housing habitability standards.
- Rental assistance will only be provided for a unit if the rent is reasonable. Recipients and sub-recipients must
  determine whether the rent charged for a unit receiving rental assistance is reasonable related to rents
  charged for comparable unassisted units through <a href="www.affordablehousing.com">www.affordablehousing.com</a><sup>13</sup> (IHCDA Preferred) or
  <a href="www.rent-o-meter.com">www.rent-o-meter.com</a>. The rent must not exceed what is determined to be reasonable.
  - For ESG RRH, rental assistance may only cover up to the Fair Market Rent (FMR) for a unit, in addition to the rent being reasonable. The FMR rates are published annually by HUD.
  - o For CoC RRH, rental assistance can exceed the FMR for a unit, as long as the rent is reasonable.
- All recipients or subrecipients should establish a conflict-of-interest policy that prohibits anyone from
  conducting a housing inspection or determining rent reasonableness or fair market rate when the individual
  doing the assessment has an interest in the property being assessed and requires that either activity be done
  by a non-interested person. If the organization owns the unit (allowable under project-based assistance), it
  must contract with a third party to make these determinations.

<sup>&</sup>lt;sup>12</sup> For more detailed information on Housing Quality Standards, go to: https://www.hud.gov/sites/documents/DOC\_35620.PDF

<sup>&</sup>lt;sup>13</sup> Formerly, GoSection8.

#### Termination of Assistance

RRH providers may terminate assistance to a participant who violates program requirements or for other actionable and documented reasons. Each recipient and subrecipient must have an agency level policy outlining potential reasons and procedures for termination and establishing a grievance policy and appeals process. A termination letter must promptly be sent to the client; the client has the right to appeal the termination decision. A copy of the potential reasons for termination and the grievance policy shall be provided to all clients at intake.

# Ongoing Training and Learning Opportunities

Monthly Rapid Re-Housing office hours will be offered to support on-going learning and improvement for all RRH providers. These spaces are an opportunity for RRH staff to come together to problem-solve, share best practices, and learn from peers. Additional resources on how other communities are using RRH services can be found at the <u>National Alliance to End Homelessness</u>(Additional opportunities will be provided for grant specific DV service providers who have received CoC funding. Please consult with the CoC Grants Analyst for an updated calendar.).

#### Questions

For any questions, contact the IHCDA staff at <a href="mailto:communityservices@ihcda.in.gov">communityservices@ihcda.in.gov</a>. If there are funding-specific questions allowable expenses or procedures under your contracts, please contact:

- General Grants: communityservices@ihcda.in.gov
- CoC DV Projects: Jenna Childress at <u>jchildress@ihcda.in.gov</u>
- CoC General Projects: Candace Jameson at <a href="mailto:cajameson@ihcda.in.gov">cajameson@ihcda.in.gov</a>
- ESG Projects: Diane Walker at diwalker@ihcda.in.gov

# Required Policies<sup>14</sup>

**Confidentiality**. All RRH providers must have an agency confidentiality policy. The confidentiality policy shall adhere to departmental requirements, as set forth in executed contracts. Lead agencies shall have a copy of its subcontractor's confidentiality policies on file.

**Grievance and Appeal Processes**. All RRH programs must have a grievance and appeal process that is written and documented.

**Maintenance of Records**. RRH providers shall maintain program participant case files for all households referred to the program. All documentation related to program participant services shall be maintained in files as described above, in a secure location. Records shall be maintained for a period of five years after the expenditure of all grant funds. Whenever possible, scan and upload documents to HMIS. HMIS files may be monitored as a substitute for paper records and case notes.

**Educational Rights**. All RRH programs must inform homeless families and youth of their rights under the *Every Student Succeeds Act* (formerly McKinney-Vento Education Services).

**Violence Against Women Act (VAWA).** All RRH programs must provide notice of occupancy rights to the head of household and each adult tenant living in the household. An emergency transfer plan must be adopted based on HUD requirements. Records for all emergency transfer requests and outcomes must be maintained. Notice of

<sup>&</sup>lt;sup>14</sup> The IN BoS CoC reserve the right to review any required policies at any time.

Occupancy Rights (HUD-5380) and Certification Forms (HUD-5382) are to be given to adult tenants at the time of move-in. Landlords need to sign the VAWA Lease Addendum.

#### Documentation and Recordkeeping Requirements

All homeless projects in the Indiana Balance of State Continuum of Care (IN BoS CoC) must maintain standard operating procedures for ensuring that state and federal program funds are used in accordance with all requirements. These procedures should include maintaining sufficient agency and client records.

#### Organizational Recordkeeping Requirements

IN BoS CoC homeless projects must maintain the following records at the organizational level:

- Standard Operating Procedures maintain procedures for ensuring that program funds are used in accordance with all applicable requirements.
- Conflict of Interest Policies maintain conflict of interest policies and evidence compliance with CoC, organizational, or funding entity conflict of interest requirements
- Homelessness Representation and Participation (CoC-funded projects required; ESG-funded project recommended) maintain evidence that at least one homeless or formerly homeless individual sits on the board of directors or other equivalent policymaking entity.
- Fair Housing and Equal Access<sup>15</sup> All CoC and ESG assisted programs must have updated policies and procedures that reflect fair housing requirements. The Fair Housing Act prohibits housing discrimination on the basis of any "protected class." Protected classes include race, color, religion, sex, sexual orientation, gender identity, disability, familial status, and national origin. The Act applies to all housing, regardless of the type of funding or ownership, including housing owned by private individuals or organizations. All CoC and ESG assisted programs must have updated policies and procedures that reflect fair housing requirements.

#### Grant-Specific Recordkeeping Requirements

IN BoS CoC homeless projects must also maintain the following records pertaining to their specific projects:

- Project-Specific Policies and Procedures maintain policies and procedures regarding documentation of program participant eligibility and all other aspects of program operation to ensure compliance and consistency among staff.
- Services Provided document the types of supportive services provided to participants and the amount spent on those services, as well as evidence that ongoing assessment of overall service needs was offered and/or provided.
- Housing Quality Standards where required to be conducted, retain documentation demonstrating that HQS inspections were completed for units paid for with rental assistance funds.
- ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing where required to be conducted, retain documentation demonstrating that habitability inspections were completed for ESG funded projects
- Match maintain records of the source and use of all cash and in-kind contributions used to satisfy federal/state match requirements. These records must further indicate the grant/project and fiscal year for which the matching contributions were provided. CoC RRH has a 25 percent match requirement and ESG RRH has 100% match requirement.

<sup>&</sup>lt;sup>15</sup> For more information, go to: <a href="https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/fair-housing-and-equal-access/">https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/fair-housing-and-equal-access/</a>.

#### Program Participant Recordkeeping Requirements

IN BoS CoC homeless projects must document and maintain records related to participant eligibility and the services provided to participants. An overview of these requirements is as follows:

- Homeless Status maintain records documenting acceptable evidence of participants' homeless status; These records must comply with CoC Program or ESG requirements, depending on funding source.
- Other Program Eligibility Verification document compliance with any other program eligibility criteria, such as disability status.
- Services and Assistance Provided homeless projects must keep records for all program participants that outline the service provided, including:
  - Evidence that, at minimum, an annual assessment of service needs was completed (certain programs require more frequent assessment)
  - o In cases of participant termination from a program, the project must demonstrate that it followed all applicable federal requirements
- Annual Income when any kind of rent is paid by program participants or when program eligibility is based in part on income, the homeless project must keep the following documentation of annual income:
  - Income evaluation form (some programs require that specific forms be completed)
  - Source documents (wage statements, bank statements, etc.)

# Appendix 1: Receipt and Acceptance of these Policies

Please sign below and return a copy to IHCDA at <u>communityservices@ihcda.in.gov.</u> Please retain this signed document in your files for monitoring purposes.

I hereby acknowledge receipt of the RRH Written Standards for CoC and ESG through the Balance of State Continuum of Care. I have read and understand the policies set forth and agree to abide by them and will ensure all direct service staff have also read and understand these policies. I also understand that if these policies are not adhered to, the grant funding received could be at-risk.

Agency		
CEO or Executive Director Signature	Date	

## Appendix 2: Definition of Terms

Case Management: Housing-focused case management focuses on immediate efforts to attain housing, using the minimum assistance needed to address each household's immediate housing crisis. Staff works with each household to identify and refer households to other resources in the community (e.g., mainstream services, benefit services, food assistance programs, childcare resources, etc.) to support ongoing housing stability. Services are voluntary, housing-focused, person-centered and are provided at the level needed by each household. See also: Progressive Engagement.

**Entries from Homelessness:** Measures the degree to which programs are serving people who are literally homeless, including a place not meant for human habitation, or in an emergency shelter. The measure is calculated in HMIS based on responses to 'immediate prior living situation.'

**Exits to Permanent Housing:** Measures the percentage of households who exit the program into a form of permanent housing (including supportive housing, stable/long term rental housing, subsidized housing, or market rate housing). The exit destination reflects whether a household is stably housed after leaving the RRH program; self-resolving is considered an exit to permanent housing.

**Harm Reduction**: A "harm reduction philosophy" will be implemented for Clients who have relapsed from substance abuse or continue to abuse substances, so that health care, support and housing continue to be provided to program participants.

**Housing First:** "A Housing First orientation means that the program is organized around helping people secure a place to live, without preconditions. While gaining income, self-sufficiency, and improved health are all desirable goals, they are not prerequisites to people being housed. In a system organized around Housing First principles, shelter and housing programs have minimal entry barriers and do not require clients to participate in services or gain skills/income as a condition of receiving housing assistance." <sup>16</sup>

**Housing Location:** Activities related to engaging with and recruiting landlords, property management companies, and housing developers to increase access to permanent housing for homeless and other vulnerable individuals and families. This may include incentives and supports made available to participating landlords and property managers who agree to reduce screening criteria for households with barriers to permanent housing.

**Lengths of Stay:** Measured as the number of days from program enrollment to program exit. For RRH programs, this is defined as the time from initial intake to the end of all RRH services (financial assistance and case management).

**Progressive Engagement:** "Services start with the least intensive service and amount of subsidy i.e. a "light touch", and progress to greater service intensity only when necessary. The need for additional support is determined by an assessment of the individual or family's experience, self-reporting, and the impact of the initial intervention. Client choice, to the extent feasible, drives the housing options and services offered. Participation in services is voluntary." Progressive engagement fundamentals include:

- Voluntary and flexible participation by household
- Critical thinking and problem solving shared between the family and provider
- Starts with minimal support, based on what the household identifies they need
- Connections made to community resources
- Builds on family resiliency and strengths
- Focused goal: to quickly resolve the immediate crisis of homelessness<sup>18</sup>

<sup>&</sup>lt;sup>16</sup> NAEH Fact Sheet: http://endhomelessness.org/wp-content/uploads/2016/04/housing-first-fact-sheet.pdf

<sup>&</sup>lt;sup>17</sup> https://endhomelessness.org/blog/what-is-progressive-engagement/

<sup>&</sup>lt;sup>18</sup> https://endhomelessness.org/blog/what-is-progressive-engagement/

**Return to Homelessness:** Measures the percentage of households who have exited the program to a permanent housing situation and are subsequently served by another homeless intervention (i.e., emergency shelter, transitional housing, or rapid re-housing) in HMIS.

**Trauma Informed Care:** A Trauma Informed Care (TIC) Model shall be incorporated into service delivery. TIC is an approach that recognizes the widespread impact of trauma and understands potential paths for recovery, recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system, responds by fully integrating knowledge about trauma into policies, procedures, and practices and seeks to actively resist re-traumatization. TIC models generally include a focus on the following: Safety; Trustworthiness and Transparency; Peer Support; Collaboration and Mutuality; Empowerment; Voice and Choice; and Cultural, Historical, and Gender Issues.

# Appendix 3: Sample Client Contribution Program Structures

- 1. Rent is \$1,000/month. Program pays 100 percent of the rent limited by FMR for ESG or Rent Reasonableness for COC for the first three months, 50 percent of the rent for the next three months, 25 percent of the rent for the last three months).
- 2. Program pays up to 100% of 1st month's rent limited by FMR for ESG or Rent Reasonableness for COC; In 2nd month, the Household pays 30% of net household income towards rent and program pays for the remaining portion; In 3rd month and beyond: Household pays 60% of their net household income towards rent and the program pays the remaining rent; the subsidy ends in the 12th month.
- 3. Participants may receive rental assistance of no more than the following percentages of the applicable HUD Fair Market Rent (FMR) for ESG or Rent Reasonableness for COC for each of the indicated time frames (security deposits are excluded from these limits): Months 1-3: rental assistance provided may be up to 100% of the applicable FMR of RR; Months 4-6: rental assistance provided may be up to 80% of the applicable FMR or RR; Months 7-9: rental assistance provided may be up to 60% of the applicable FMR or RR; Months 10-12: rental assistance provided may be up to 40% of the FMR or RR.

For assistance with developing a policy around Client Contributions Plan, please reach out to the IHCDA Community Services Division at community services@ihcda.in.gov



# Homeless Definition

S	Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:  (i) Has a primary nighttime residence that is a public or private place not meant for human habitation;  (ii) 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  (iii) 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
CRITERIA FOR DEFINING HOMELESS	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that:  (i) Residence will be lost within 14 days of the date of application for homeless assistance;  (ii) No subsequent residence has been identified; and  (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
CRIT	Category 3	Homeless under other Federal statutes	(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:  (i) Are defined as homeless under the other listed federal statutes;  (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;  (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
	Category 4	Fleeing/ Attempting to Flee DV	(4) Any individual or family who:  (i) Is fleeing, or is attempting to flee, domestic violence;  (ii) Has no other residence; and  (iii) Lacks the resources or support networks to obtain other permanent housing



# Homeless Definition

	Category 1	Literally Homeless	<ul> <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;         <ul> <li>For individuals exiting an institution—one of the forms of evidence above and:</li></ul></li></ul>
RECORDKEEPING REQUIREMENTS	Category 2	Imminent Risk of Homelessness	A court order resulting from an eviction action notifying the individual or family that they must leave; or For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; or A documented and verified oral statement; and  Certification that no subsequent residence has been identified; and Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
NDKEEPING F	Category 3	Homeless under other Federal statutes	<ul> <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; <u>and</u></li> <li>Certification of no PH in last 60 days; <u>and</u></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; <u>and</u></li> <li>Documentation of special needs <u>or</u> 2 or more barriers</li> </ul>
RECOF	Category 4	Fleeing/ Attempting to Flee DV	<ul> <li>For victim service providers:         <ul> <li>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> <li>For non-victim service providers:</li></ul></li></ul>

# Appendix 5: Indiana Balance of State Continuum of Care Approval Timeline

Action	Changes	DATE
Board Review and Approval policy for CoC and ESG RRH Written Standards	Complete Document Review	05/19/2022