

Appendix 4:

San Diego Housing Commission ESG Standards

City of San Diego
Emergency Solutions Grant
San Diego Rapid Re-housing Program (SDRRP)
Program Policies and Procedures

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A. Program Intent

The San Diego Rapid Re-housing Program (SDRRP) provides resources to homeless individuals and families to enable them to leave their homeless situation as quickly as possible and enter stable, permanent housing. This program provides support for participants to develop a housing plan, find appropriate housing, and get financial support both pre-housing and after becoming housed. It also provides case management to help participants with the resources they need to maintain this housing long term.

SDRRP resources will be targeted and prioritized to serve households that have some type of income and are most likely to achieve stable housing. However, programs may also assist chronically homeless individuals and families who may have significant barriers to getting housed and maintaining their housing. These individuals may require extended (medium term) assistance to allow them to maintain their housing and when possible, an opportunity to exit to a long term permanent housing assistance.

These funds are intended to help individuals and families who would be homeless *but for this assistance*, and have no other resources. SDRRP will use a progressive engagement approach: assistance will be based on the individual needs of each participant, using just enough assistance to keep a person in housing and preventing the participant from becoming homeless or returning to homelessness in the near-term. Re-evaluation of the participant's circumstances over time will determine the level of support a participant may receive.

San Diego Rapid-Re-housing assistance is not intended to provide long-term support, nor will it be able to address all the financial and supportive services needs affecting housing instability. Since not all participants will have the same level of need, it is not expected that all persons will receive identical levels of assistance. All assistance will be individualized to the participant's unique situation.

The San Diego Housing Commission (SDHC) has designed its program with the following **general initiatives and guidelines** in place:

Initiative: Serve families and individuals who are currently living on the streets, in shelters, or transitional housing with security deposits and limited rental assistance;

Initiative: Provide security deposits as a bridge to permanent housing under the Security Deposit Plus Program. The following types of programs are targeted because they result in ongoing permanent housing through mainstream resources: Veterans who are awarded a VASH voucher; homeless individuals on the downtown Vulnerability Index list who are getting a Sponsor Based Voucher; homeless individuals on the Project 25 list who are getting a Sponsor Based Voucher; homeless individuals who are moving into a Project Based Voucher unit; homeless individuals who are getting HOPWA permanent housing.

Guidelines: Homeless individuals and/or families receive an initial eligibility screening through the Coordinated Entry System (CES) for a referral to a rapid rehousing program. Once a referral has been made, a provider agency will perform an in-depth screening and collect the appropriate paperwork necessary to determine final eligibility for the SDRRP. Clients may be eligible for up to 12 months of financial assistance which may include deposits, housing assistance, moving assistance, and other eligible financial assistance with the goal to help people gain and maintain stable housing. In a limited, case by case basis, clients may get more than 12 months assistance, but not more than 24 months, only if authorized by the SDRRP administrator.

B. Definitions

Persons receiving SDRRP assistance are homeless at the time they begin receiving assistance according to HUD's definition of homelessness. Program participants must meet the definition of homelessness as defined by HUD in 24 CFR 576.2. e.g., people who are living on the streets, in emergency or transitional shelters, or fleeing domestic violence and have no other support, will be assisted. Persons served by the SDRRP do not lose their homeless status and remain eligible for assistance under other Continuum of Care funded programs.

C. Eligible Activities/Assistance

1) Financial Assistance

a) Financial assistance

SDRRP funds may be used to provide financial assistance for households as long as the household would be homeless "but for" the assistance, the full amount of the financial assistance is going towards rent or utilities (for example, no funds may be used for taxes or fees that may be associated with homeownership). Whenever possible, SDRRP direct financial assistance should be provided to cover *only a portion* of the total cost-type; clients will be encouraged to come up with sustainable ways to supplement this financial assistance. The Case Managers will use a "progressive engagement" approach to ensure clients get a minimum amount of assistance for a limited period of time for the client to gain stability in housing.

Direct financial assistance can be used to cover the entire cost of rent or utilities *only* in cases where the client has been chronically homeless and does not have any resources or income to supplement the financial assistance. Clients will pay a portion of their income in rent.

b) Short term rental assistance

Assistance can be for up to three months. Participants can be re-evaluated to receive a longer term subsidy, if needed and if funding is available.

c) Medium term rental assistance

Assistance can be up to twelve months. Longer assistance (up to a maximum of 24 months) may be available on a case by case basis as approved by the SDRRH administrator.

d) Eligible Activities and Types of Assistance

1. Rental Assistance

No more than a cumulative total of 24 months of rental assistance is allowable under SDRRP; however, the SDHC program will allow up to 12 months of rental assistance, and an extension up to 24 months in extenuating circumstances on a case by case basis as approved by the SDRRP administrator. These circumstances may include clients who are transferring to another rental assistance program and need SDRRP to provide a bridge to their new assistance program (e.g., HOME TBRA, Section 8 voucher or Sponsor Based Voucher).

2. Rental Arrears

No more than a cumulative total of 6 months rental arrears are granted to any household, and counts toward the 24 months limit for rental assistance. The months need not be consecutive. Rental arrears would only be payable if these arrears prevented a participant from getting into housing.

3. Security and Utility Deposits

Payment of reasonable and appropriate security and utility deposits are allowable under the SDRRP. Maximum of two months security deposits are allowed and are not repayable to the SDHC.

4. Utility Payments

No more than a cumulative total of 12 months utility payments are allowable to any household, counted separately from rental assistance. Only costs for eligible utilities are paid (heat, electricity, water, sewer, and garbage).

5. Utility Arrears

No more than a cumulative total of 6 months utility arrears are granted to any household, which counts toward the 12-month limit for utility assistance. The months need not be consecutive.

6. Moving Costs

Moving costs for truck rental, moving company, short-term storage (up to 3 months), and related expenses are paid only if reasonable and appropriate. The SDHC program will allow a maximum of \$1000 per household for moving costs including utility activation.

7. Hotel/Motel Vouchers

Hotel/Motel vouchers are not allowed under this program.

2) Housing Stabilization Services

a. Housing search and placement activities: services necessary to assist participants in obtaining housing, including:

- Assessment of housing barriers, needs and preferences;
- Development of an action plan
- Housing search
- Outreach and negotiation with owners
- Assistance with rental applications and leases

- Housing inspections and rent reasonableness determination
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

b. Housing stability case management: services to facilitate housing stability and overcome barriers, including:

- Evaluating applicants using program intake
- Verifying documentation of eligibility
- Counseling
- Coordinating services for participants
- Assistance with application for mainstream benefits
- Monitoring participant progress
- Providing information and referrals to other service providers
- Developing individualized housing and services plans, including path to permanent housing stability
- Conducting participant re-evaluations

c. Provision of Legal services related to gaining and maintaining permanent housing

d. Credit Counseling and credit repair

3) Data Collection/Evaluation

Data collection and reporting for SDRRP will be conducted through the use of the local Homeless Management Information system (HMIS).

D. Ineligible Activities/Assistance

1) Mortgage Assistance

SDRRP is not a mortgage assistance program. Mortgage assistance includes payment of taxes and fees relating to home ownership. Congress has set up other programs to assist with the current mortgage crisis. HUD-approved housing counseling agencies are available to provide information and assistance to avoid foreclosure.

2) Services to participants in full or subsidized housing

If a participant is receiving rental assistance under another program (either a full or partial subsidy), SDRRP funds may not be used for rental assistance during that same time period. Clients receiving rental assistance under another program may be eligible for other types of SDRRP assistance, as long as they are not also receiving that “type” of assistance through another source. For example, a homeless veteran entering a HUD-VASH project may receive security deposit assistance with SDRRP funds.

3) Serving participants receiving other Federal, State or Local assistance.

Financial assistance payments cannot be provided for participants receiving the same cost type (rent payments, utility assistance, moving costs, utility deposits, security deposits, rental arrears) through another federal, state, or local subsidy program. Rental assistance

funds cannot be used if a participant is receiving rental assistance through another program (either a full or partial subsidy).

4) Other Ineligible Activities/Assistance

At this time, the SDHC is not offering homeless Prevention assistance.

E. Benefit Limits

No household can receive more than 24 months of assistance under SDRRP. The City of San Diego's SDRRP program will operate a short and medium term assistance program of up to 12 months of rental assistance for program participants. However, there may be extenuating circumstances that will require continued rental assistance up to 24 months in which case we will extend the subsidy on a case by case basis as approved by the SDRRP administrator. (e.g., providing a bridge to another subsidy).

F. Citizenship Requirements and Verification

In accordance with Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, an alien (a person who is not a U.S. citizen or national) may be eligible for assistance under the Security Deposit Plus Program only if he or she is a "qualified alien" (defined in 8 U.S.C. 1641). However, nonprofit subcontractors are not required to ask clients their residency status.

G. Eligibility

1) Eligibility Criteria

- Individuals or families who are homeless and have no other resources by which to gain housing, including help from family and/or friends who can provide a place to stay.
- There is no age restriction on persons receiving assistance however SDRRP cannot serve youth who are wards of the state.
- No appropriate subsequent housing options have been identified.
- Household must be willing to cooperate with developing a case plan and work toward completing activities within their plan to increase housing stability and self-sufficiency.
- This may include a requirement to attend Budget and/or Financial Education classes.
- Client must live within the City of San Diego, or their last known address must be within the City of San Diego.
- Client must show a desire and commitment to attain and maintain permanent housing.
- Client will not be a certified sex offender; national registry will be checked.

2) Income Criteria

At the time of the initial screening and application, there is no income requirement; however, if a household is still being assisted after 12 months, they must be recertified and their income must be 30% AMI or less.

3) Rapid Rehousing Homeless Eligibility Criteria

To be considered for SDRRP services a household's housing status must be one of the following:

- Sleeping in an emergency shelter
- Sleeping in a place not meant for human habitation, such as cars, parks, abandoned buildings, streets/sidewalks, etc.
- Staying in a hospital or other institution for up to 90 days or less and was sleeping in an emergency shelter or other place not meant for human habitation (cars, parks, streets, etc.) immediately prior to entry into the hospital or institution
- Residing in a transitional housing program for homeless individuals and/or families
- Victims of domestic violence who have no other residence and lack resources and support networks to obtain other housing.

4) Eligibility Recertification

Households must be re-evaluated for eligibility, need and appropriateness of services/assistance after 12 months of assistance.

H. Verification/File Requirements

All programs must verify and document the homeless eligibility of all SDRRP applicants prior to providing assistance and for maintaining this documentation in the participant case file once approved for assistance. For purposes of SDRRP, HUD allows various types of documentation, ranging from third party verification to applicant self-declaration.

Documentation standards, in order of preference are as follows:

Third Party Verification – verification in writing from a third party (e.g. individual employer, Social Security Administration, welfare office, HMIS, etc.) either directly to SDRRP staff or via the applicant. Staff should document third party verification and retain documentation in the participant file.

Intake Worker Observation – Documentation by an intake worker as to where a person has resided prior to intake.

Applicant Self-Declaration – Staff should document an applicant's self-declaration and retain documentation in the participant file. HUD expects a conscientious and reasonable effort be made by programs to use third party verification as the standard in most cases. Documents and information collected to verify income should be recent.

I. Case Management

All SDRRP participants must be case managed and meet with their case manager once a month at a minimum. (See Housing Stabilization Services for a list of types of services.)

1) Intake

Every participant receives a comprehensive assessment (financial and services) with a case manager who assists the applicant in developing a case plan that prioritizes needs based on the severity of their housing crisis and targets the most appropriate response with the situation presented.

The intent is to discern primary need and the urgency of the need. Participants will be asked if they have any other type of assistance (financial or housing) available through

family and friends. They will also be asked to create a budget to see what they can afford to pay toward their housing. This will help establish the lowest amount of financial assistance needed from the SDRRP to enable the participant to remain housed.

2) Housing Assessments

Depending on the urgency and priority identified in the intake, the SDRRP program will conduct a comprehensive assessment with the household. The assessment, at a minimum, will identify the housing needs of the household. The assessment will function as the basis for creating a housing plan and placement which serves as the foundation for resource coordination and resolution of the housing crisis. It will require staffing or resources familiar with the local housing market and with services.

3) Case Management Housing Stability Plan

A case management plan must be completed for all individuals that receive housing assessment. The plan is intended to be a guide for both the household and the service programs. It must focus on increasing income and stabilizing housing. The plan can also identify needed community resources, referrals to partnering agencies especially for mainstream benefits, budget education and tenant education.

J. Lease Agreements

A lease must be in place and the program participant must be on the lease in order to use SDRRP funds for the rent or security deposit.

K. Habitability Standards/Lead-Based Paint Inspections

Units must pass a habitability inspection and lead based paint inspection performed by a provider agency or a Housing Quality Standards (HQS) inspection performed by the SDHC before payments are made to the landlord on behalf of the client.

Units must be “rent reasonable” as determined by the SDHC or by the provider agency. Rents are capped at the current FMR.

Clients will have a written lease with the landlord.

A written agreement with the recipient/subcontractor and the landlord must be in place before rental assistance is paid to a landlord.

L. Termination

Programs must provide a formal termination process that recognizes the rights of individuals receiving assistance. This process, at a minimum, must consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination.
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision.

- Prompt written notice of the final decision to the program participant.

M. Appeals/Grievances

Clients who wish to appeal decisions about their assistance or participation in the SDRRP may take the following steps:

Submit an appeal in writing to the program administrator (other than the person who made the decision) of the organization that is funding them; the program administrator will review the claim and allow the client to present oral or written information on their behalf; a decision in writing will be made promptly to the client.

SDRRP subcontractors may create their own appeal process, which must be based on the process described above.

N. Financial Management

Payments will not be made directly to program participants, but only to third parties such as landlords and utility companies. Rental assistance cannot exceed the actual rent cost based on FMRs. Programs may not charge program fees to participants.

O. Reporting Requirements

Sub-grantees will compile data for SDRRP reporting using HMIS, which is managed by the Regional Task Force on the Homeless. Data completeness and integrity is key. Programs should prioritize correcting errors and integrate the reoccurring task into their program processes.

1) Monthly Reports

Subcontractors to the SDHC will provide monthly reports to the SDHC; the SDHC will provide monthly reports to the City of San Diego.

2) Annual Performance Report

SDHC is required to submit an Annual Performance Report to the City of San Diego at the end of each fiscal year. Annual Performance Reports will report the number of individuals and households served, demographic data and outcomes related to housing stability and clients housed.

P. HMIS Data Entry

SDRRP requires participation in HMIS. Programs must enter accurate and complete data into HMIS at the time of service.

Q. Client Confidentiality and File Security

Client confidentiality will be maintained and their information secure with internal files and computer processes. Client will be asked to sign "Authorizations for Release of Information" forms by both the SDHC and by subcontractors. Staff will not discuss clients'

information without this signed authorization. Files will be maintained in secure, lockable cabinets where only staff who “need to know” are authorized to view them.

R. Conflict of Interest

With respect to the use of SDRRP to procure services, equipment, supplies or other property, states, territories and units of general local government that receive ESG funds shall comply with 24 CFR 85.36(b)(3), and non-profit subrecipients shall comply with 24 CFR 84.42.

S. Subrecipient Management & Selection

Any subrecipient for the SDRRP will be selected through a public process via a Notice of Funding Availability which is advertised in the newspaper and outreach made to various interested parties. The SDHC has a Procurement Policy PO203.100 which outlines requirements for our NOFA solicitation process as well as in accordance with 24 CFR part 85.

Contracts with subrecipients will contain a Scope of Work which spells out a description of the program, the deliverables the contractor will perform for SDRRP and a budget. Contracts will also contain clauses about drug-free workplace requirements, program specific audit requirements, lobbying requirements, and conflict of interest.

Subcontractors are required to maintain client confidentiality and file security as described in Section Q of this Policy and Procedures document. Clients will sign releases to authorize staff to discuss their case or ask for personal information from outside sources.

SDHC staff will monitor subcontractors via desk audits and visits to the subrecipients' offices. If there are issues that need to be resolved, staff will discuss with the subcontractor and follow-up with them to ensure the issues are resolved.

SDHC will hold regular meetings with subcontractors to ensure programmatic performance goals, program changes, reporting requirements, HMIS, and client file issues are being discussed and resolved in a timely manner, with input from the full ESG RRH collaborative.

Subrecipient assets purchased with SDRRP funding will be documented and labeled to ensure property is available and maintained throughout the life of the grant and proper disposition of property when the grant is over.

Subrecipients are required to contribute in a timely manner to monthly and annual ESG reports. They are also required to enter their data into the local HMIS system.

Subrecipients are required to maintain SDRRP client files for the duration of the grant, as well as five years after the grant ends. If they wish to dispose of the files, they must ask SDHC when this can take place.