



CONTINUUM OF CARE
WINSTON-SALEM FORSYTH COUNTY

Forsyth County Rapid Re-Housing Program Policies and Procedures

Summer 2015, with January 2017 Amendments

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Program Overview

PROGRAM GOAL

The Forsyth Rapid Re-Housing Collaborative (FRRC) is a partnership between the City of Winston-Salem, United Way of Forsyth County, Housing Authority of Winston-Salem (HAWS), Goodwill Industries of NWNC, Experiment in Self-Reliance (ESR), Samaritan Ministries, Bethesda Center for the Homeless, The Salvation Army of Winston-Salem, Family Services and Next Step Ministries and other members of the Winston-Salem Forsyth County Continuum of Care (COC) to provide rapid re-housing assistance to households in Forsyth County who become homeless and but for this assistance would not be able to re-enter permanent housing.

The FRRCs vision is that it will support the Winston-Salem/Forsyth County Continuum of Care achieve it's three primary goals:

- 1) End Homelessness in our community, by creating the service system to support individuals and families who have lost permanent housing to re-enter permanent housing within 30 day;
- 2) Reduce the number of people who have been homeless who return to homelessness; and
- 3) Decrease the number of people who become newly homeless.

Program Vision

That all people experiencing homelessness within the service area of the Winston-Salem/Forsyth County Continuum of Care will receive the support and services necessary to re-enter permanent housing within 30 days of becoming homeless and to maintain permanent housing for the long term.

Partnership Roles and Responsibilities

The City of Winston-Salem is the Collaborative Applicant for the Winston-Salem/Forsyth County COC. It also receives funding from the Emergency Solutions Grant both as an entitlement community (ESG City) and through the State of North Carolina (ESG State). Through these sources the City helps provide funding for both case management and temporary financial assistance (TFA). The City also provides technical assistance on best practices, policies and procedures for program implementation.

United Way of Forsyth provides backbone support for the collaborative. Its role includes:

- a) Coordinate the overall Forsyth Rapid Re-Housing Collaborative, including the sub-programs REACH and the Veterans Re-Housing Program. These responsibilities will include processing and tracking referrals from the Community Intake Center to the Agency.
- b) Provide CoC, Emergency Solutions Grants and other funds for utility deposits, moving cost assistance, rental application fees, security deposits, rental arrears, utility payments and utility arrears to facilitate housing placement of RRH Program participants referred to the Agency, as appropriate to each participant's case, as determined by United Way.
- c) Provide housing placement and stabilization consultation services to the Agency, which shall be defined as assisting the Agency in identifying appropriate housing for program participants, and advising the Agency to help resolve housing issues affecting the ongoing tenure of participants in permanent housing under the RRH Program.
- d) Coordinate training, support and coordination between all CoC member agencies participating in the FRRC.

The United Way of Forsyth County's role includes

- a) Execute rental assistance contracts with property owners.
- b) Administer security deposits and rental assistance payments.
- c) Administer the Housing Quality Standards inspections process.
- d) Participate in training and coordination activities between all partners of the FRRC.

Goodwill Industries of Northwest North Carolina role includes:

- a) the Program Director for the Collaborative is housed at Goodwill Industries. The Program Director provides training and support to case managers offering rapid re-housing services. She is responsible for monitoring that all rapid re-housing client files contain the appropriate required documentation for both state and federal funding. The Program Director will also provide mentoring and on-going training for all case managers offering rapid re-housing assistance.

Homeless Service Providers with Rapid Re-Housing Case Management Staff will:

- a) Accept RRH Program referrals from the Community Intake Center which is administered by United Way.
- b) Process RRH Program participant applications in a timely manner upon receipt of referral.
- c) Ensure that all case management staff providing rapid re-housing services receives appropriate training in best practices in providing rapid re-housing services.
- d) Assist participants in identifying and securing permanent housing as the primary service. .
- e) Provide case management, which shall be defined as assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of RRH program participant(s) who are living in permanent housing, with the goal of assisting the participant to maintain stability in permanent housing.
- f) Maintain all required documentation for rapid re-housing services
- g) Provide information to United Way, HAWS, the City and the participant in a timely manner to facilitate program and participant success.
- h) Enter all required data in the Homeless Management Information System.
- i) Participate in training and coordination activities between all partners of the FRRC.
- j) Comply with all other policy and procedures in the FRRC Policy and Procedure manual.

PROGRAM IMPLEMENTATION STRATAGY OVERVIEW

Program participants will receive, as direct services from the Forsyth Rapid Re-Housing Collaborative and through referrals to other community providers, assistance with case management, housing counseling, disability advocacy, financial planning services, transportation, income support, legal services, child care, housing counseling and housing service as necessary to achieve housing stability for the identified household. All services which are offered by this program or by referral shall be focused on helping homeless families achieve housing stability.

Services from the FRRC are meant to provide short to medium term intervention services. One of the keys to long term success will be insuring that during the program participation, households develop a network of support in the community outside of the FRRC program. Case Mangers will work with the household to connect the participant households to key mainstream services, including the Veterans Administration, Department of Social Services, Social Security and other local service providers and support providers for long term support where necessary.

PROGRAM AUTHORITY

All program decisions will be made in accordance in with this policy and procedure manual, the grant agreement between United Way of Forsyth County and the City of Winston-Salem, grant agreements between the Collaborative partners and the City of Winston-Salem and other funders and by the memorandums of understanding within the collaborative.

Where any conflict or lack of clarity between these policies and procedures, the grant agreements, and existing memorandums of understanding exist, federal policy as set forth in the COC and ESG regulations shall control.

Conflict of Policies- Policy Priority

The purpose of this manual is to assist agencies partnering with the United Way of Forsyth County on the Forsyth Rapid Re-Housing Collaborative (FRRC). Where policies in this document conflict with either agency policies or procedures, as it pertains to clients participating in the FRRC the policies from this manual will take precedence.

If there is a conflict between these policies and federal regulations, the federal regulations will take priority.

Key Definitions

Area Median Income (AMI): Midpoint in the family-income range for a metropolitan statistical area or for the non-metro parts of a state. The figure often is used as a basis to stratify incomes into low, moderate and upper ranges. The AMI for each metropolitan statistical area is published each year by the Department of Housing and Urban Development. These data will be used at the determining income guidelines for the program and will be updated on an annual basis.

Homeless: The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009 amends the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, revises the Emergency Shelter Grants program and renames the program the Emergency Solutions Grants program. The amendment and final rule integrates the regulation for the definition of "homeless," and the corresponding recordkeeping requirements, for the Emergency Solutions Grant program. In December 2011, the Homeless Definition Final Rule was published in the Federal Register that revises the definition of "homeless." This is the definition of homeless to be used by the FRRC for all rapid re-housing services:

Homeless:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- ii. An individual or family living in a supervised 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, or local government programs for low-income individuals); or
- iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

- (2) An individual or family who will imminently lose their primary nighttime residence provided that:
- i. The primary nighttime 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, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (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 section 387 of the Runaway and Homeless Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- (4) Any individual or family who:
- i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - ii. Has no other residence; and
 - iii. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Household or Family: All persons as identified by the head of household who present together for services and identify themselves as being part of the same household. For purposes of this manual household and family are used interchangeably. A household or family may be as small as an individual or as large as the household defines itself. There is no requirement that the household be related by blood or marriage for the participation in this program.

Literally Homeless: An individual or family is defined as “literally homeless” if:

- (1) living in a public or private place not meant for human habitation,
- (2) living in temporary shelter, which includes congregate shelters and transitional housing, or

(3) exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution. Rapid Re-Housing: ESG vs. CoC Page 4 3-12-13

Participant: a family or household that has been identified as homeless or chronically homeless pursuant to the definition of homeless herein, and has been assigned to rapid re-housing services by the Community Intake Center.

Permanent housing: Community-based housing without a designated length of stay which can include both permanent supportive housing and rapid re-housing. The tenant must have a lease, in their name which lasts at least one year that is renewable and terminable only for cause. . Examples of permanent housing include, but are not limited to, a house or apartment with a month-to-month or annual lease term or home ownership. Permanent Housing is determined by the terms on the length of tenancy, not the form of payment for the right of tenancy. Thus, the provision of a housing voucher such as a section 8 voucher, shelter plus care voucher, or similar support does not define whether or not the housing is permanent housing.

Supportive services: Any of the following provided to address the needs of a participant:

- (1) Outreach services
- (2) Case management services
- (3) Assisting participants in obtaining public benefits, such as Social Security benefits, Veteran Administration Benefits, housing voucher, supplemental food assistance, educational supports for school age children
- (4) Assisting participants in obtaining and coordinating other public benefits
- (5) Other services which improve the households housing stability

Veteran: A person who served in the active military, naval, air service, National Guard, or Merchant Marines, and who was discharged or released wherefrom under conditions other than dishonorable.

Fair Housing

The FRRC complies with the letter and spirit of the Fair Housing Act, and as such no person shall be denied housing or services from this program based upon their race, color, religion, national origin, sex, sexual orientation, gender identity, veteran status, familial status, and disability. No otherwise qualified person will be denied housing or otherwise discouraged from obtaining housing through this program because of his/her race, color, religion, national origin, sex, sexual orientation, gender identity, veteran status, familial status, or disability.

Pursuant to Section 504 of the Rehabilitation Act, no qualified individual with disabilities will be excluded, solely on the basis of disability from participation in or the benefits of the program or activities administered by FRRC. FRRC will provide reasonable accommodations to all applicants, residents, and employees, who need such accommodations to be able to enjoy the benefits of the services provided by the FRRC.

In assisting households in identifying and securing housing, FRRC representatives will assist clients and provide guidance in requesting reasonable accommodations from current or prospective landlords to address any disabilities of household members.

Program Eligibility

To become a participant under the FRRC the following conditions must be met:

- 1) To receive ESG rapid re-housing (ESG-RRH) assistance, an individual or family must demonstrate at initial evaluation that it is literally homeless (referred to as Category 1 in the Homeless Definition Final Rule). RRH assistance is also available to people fleeing or attempting to flee domestic violence if they are also literally homeless (24 CFR part 576.104).
- 2) To receive COC rapid re-housing (CoC-RRH) assistance, individuals and families may be defined as homeless under any of the four categories included in the Homeless Definition Final Rule:
 - Literally homeless (Category 1).
 - Imminently losing their primary night-time residence (Category 2).
 - 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 are defined as homeless under another Federal statute and meet additional specified criteria (Category 3). Note: 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.
 - Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (Category 4).
- 4) To participate in the REACH program the household must meet the definition of, and there must be documentation in the file that the household is Chronically Homeless.
- 5) For all households, except households in the SSVF program, the Household income must be equal to or below 30% AMI.
- 6) The Household lacks resources and support networks sufficient to help them enter and maintain permanent housing. The program participant's household must continue to lack sufficient resources and support networks to retain housing without FRRC program assistance.

Housing First Philosophy

The FRRC shall operate using a Housing First Philosophy. While the household and members thereof may have many challenges and needs, the primary service of the FRRC is the identification of and moving into permanent housing. Support from the FRRC and its staff for housing location and for moving into an identified permanent housing unit which otherwise meets program specifications shall not be contingent on the household or members of the household meeting or achieving any specific goals or requirements, other than those set out in the terms of the lease with the landlord/ property manager.

Supportive Services Provided

The goal of the FRRC is to increase the housing stability of homeless families. In order to achieve this goal the program will provide outreach and case management services, and will assist participants to develop a personal safety net so that when the FRRC services have ended the household and its members will have access to community supports and mainstream services which can assist the household and its members in the event of additional challenges to their housing stability.

At the core of the services offered by FRRC is a housing stability case plan which will be developed between the case manager and the household participants. The case plan shall set reasonable, time oriented goals for the household members and case manager which will improve the housing stability of the household. The goals should be focused on achieving housing stability.

Housing location and assistance with moving into permanent housing shall not be conditioned on achieving any specific goals in the housing case plan.

Because of the limited nature of the rapid re-housing intervention, not all services that the household may need will be provided by the FRRC. Needs which may need to be addressed in a housing stability plan, but for which services may need to be delivered by a provider other than the FRRC staff include:

Vocational and rehabilitation counseling; Employment and training services; Educational assistance; Health care services; Daily living services; Personal financial planning services; Transportation services; Income support services; Fiduciary and representative payee services; Legal services; Child care services; Housing counseling services; Other supportive services, including time-limited payments to third parties (e.g., temporary financial assistance payments on behalf of Veteran families to landlords, utility companies, moving companies, and eligible child care providers) provided these payments help Veteran families remain in permanent housing or obtain permanent housing and meet the other requirements in 38 CFR 62.33 or 38 CFR 62.34.

Case Management Services

1. Description of Services

To effectively assist participants in achieving housing stability, program participants shall receive ongoing case management services. The primary objective of case management is to ensure that participants receive the assistance needed to promote housing stability. Case management services may include consulting with participants to conduct needs assessments, working with participants to create individualized housing stability plans that include participant specific goals, monitoring participants from the time of intake until they exit the program, and ensuring that participants obtain needed supportive services.

2. Outreach Services

Case Managers may engage in activities to engage persons for the purpose of providing immediate support and intervention and for identifying potential program participants.

3. Intake

A. Needs Assessment

Once the participant's eligibility has been confirmed, the case manager will begin by consulting with the participant to determine his/her household's needs and priorities and performing an assessment of the participant's needs. Participants entering the grantee's program will be experiencing varying degrees of housing instability, from those who require temporary support in getting through a difficult period to those who require long-term support in overcoming a combination of challenges. As such, case managers should gather as much information as possible about the participant's health, income, eligibility for public benefits,

employment skills, background, family relationships and support, and living situation in order to identify and coordinate those services that will be most effective and acceptable to the participant in improving housing stability. Some of this information will also be required for HMIS data collection.

B. Housing Stability Planning

To maximize the effectiveness of services provided to or coordinated on behalf of the participant, the case manager will work with the participant household to develop an individualized housing stabilization plan that will be based upon the household's strengths, weaknesses and priorities, as identified through the needs assessment. In some situations, the participant will have entered the program with a well-defined idea of their discrete needs and goals. In other situations, the participant may not understand how the options available through this program might contribute to housing stability. The case manager should explain the services available from not only this program, but also other community services that are available and, with the participant, establish reasonable milestones for obtaining greater housing stability. These milestones will become a set of actionable goals intended to address the participant's obstacles to housing stability. Goals should be appropriate, timely and reasonable. Once goals have been set, the case manager and participant will monitor the progress toward achieving the established goals, including requesting updates from the participant's service providers, as necessary. Case managers shall document all case plans and goals in the participants file.

Note: the provision of temporary financial assistance is an optional service. If a household does not have access to the financial means to achieve their housing stability goals, the Case Manager may authorize the expenditure of TFA, consistent with the program guidelines. In the event that TFA is provided, the case manager will document the reason for the needs, and the anticipated need of the household in the case notes.

C. Housing Search and Placement

Housing Search and Placement is the key component of the case management services. Case Managers will work with the household members to identify the needs they have in a housing unit, including bedroom size, location and amenities as well as other characteristic which impact habitability. Case Managers will actively assist households in identifying units which meet the household's needs, and will assist in negotiating a lease with the land lord/property manager.

This service shall be offered with no other conditions on the client's participation in service.

D. Housing Inspections & re-inspections

Unit inspections for all units which will receive temporary rental assistance from the COC funds shall have schedule inspection by Rapid Rehousing or Supportive Services for Veteran Families Housing Quality Standards (HQS) certified staff within 48 hours of receiving referral. Units must meet the Housing Quality Standards (HQS) before FRRC TFA will be provided to cover the cost of the unit.

If a unit fails the initial inspection, the land lord/property manager shall be provided reasonable length of time to make the repairs. RRH or SSVF certified staff will re-inspect the unit within 48 hours of notice that the improvements have been made.

If the repairs are expected to take more than 7 days to complete, the participant household may be encouraged to seek a different unit.

If a client is entering into a housing unit and will not be using COC, SSVF or ESG rental assistance, the case manager or housing specialist may perform the inspection using the Housing Quality Standards (HQS) inspections standards.

4. Role of Case Manager in Coordinating Provision of Supportive Services

The case manager will be the participant's primary point of contact within the FRRC. In addition to assisting the participant to assess his/her needs, the case manager will be responsible for coordinating the provision of supportive services. The case manager will coordinate supportive services that are offered by the FRRC and provide referrals for other supportive services not offered by the FRRC (or more efficiently or effectively provided elsewhere.)

A. Education Services

Case managers may assist the client in identifying and pursuing educational opportunities which will improve their opportunities in the local work force. When ever feasible for the household, the case manager should help the household member access educational services within the community which will improve the household members' ability to secure stable housing. .

Services which may assist clients improve their education include but are not limited to services at Goodwill Industries, Forsyth Technical Community College and other local institutions of high learning. Case managers should encourage those participants who are interested in pursuing further education to speak with a financial counselor at those institutions about educational benefits which may assist in paying for their education. All veterans who wish to further their education should be encouraged to explore educational benefits available to veterans.

B. Employment Assistance and Job Training

Case Managers shall assist participants who identify seeking employment or improving current employment situation with connecting to employment services appropriate to meet the individual's skills and goals. The Case Manager does not need to provide these services directly, but may connect the participant to other providers in the community including but not limited to the Public Library, The Prosperity Center, Urban League and Goodwill Industries.

C. Food

Case managers shall assist participants' access food assistance including Supplemental Nutrition Assistance Program Benefits, and other food assistance programs.

D. Life Skills Training

Case Managers shall assist clients in learning critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness but that are necessary to function independently in the community

E. Mental Health Services/ Substance Abuse Services

For clients who have a mental health or substance abuse issues, that affects their ability to either enter or maintain housing, the case manager shall assist the clients to identify appropriate treatment of mental health and/or substance abuse conditions by licensed professionals.

If the mental health condition impairs the participant's ability to work, the case manager will evaluate the participant for disability income. If it is determined that the individual is more likely than not eligible for

disability income, they will assist the client in applying for disability either directly or by referring them to a service within the community which will support them in their application for disability income. If the client is chronically homeless, they should be referred to a SOAR case manager to assist with the application.

Participants housing shall not be conditioned upon using or following through with treatment of any form. However, if a household is not able to maintain their permanent housing because of a lack of treatment, the case manager is encouraged to discuss the causal relationship between the mental health or substance abuse issues and housing stability and encourage the client to participate in treatment.

F. Outpatient Health Services

For clients whom have a physical health need or disability, including dental care, the case manager will assist the client in identifying and accessing appropriate services.

If the health condition impairs the participant's ability to work, the case manager will evaluate the participant for disability income. If it is determined that the individual is possibly likely for disability income, they will assist the client in applying for disability. If the client is chronically homeless, they should be referred to a SOAR case manager to assist with the application.

G. Transportation

The participants and the case manager should develop a transportation plan for the client that factors in the neighborhood where the client wishes to reside and the other areas of the community to which the client frequently travels including access to food, school, work, faith community of choice and other social services.

H. School Age Children- Coordination with Local School System

If the participating household has members who are school age children, including children who may be eligible for pre-school assistance, the case manager will assist the family in coordinating with the local school homeless liaison to ensure that the children are receiving adequate support for their educational needs.

In Forsyth County, this is Project Hope with the Winston-Salem/Forsyth County Schools.

All reasonable efforts will be made to ensure that children do not have to be removed from their school because of the families housing instability.

5. Assistance in Obtaining other Public Benefits

A. Description of Benefits/Services

As part of participant intake, the case manager should determine whether the participant is already receiving services from other sources including Social Security or the Veteran's Administration. If the participant is already receiving services, the case manager's assessment should focus on what additional services the participant may need, want and be eligible for, to refer the participant to the appropriate office for assistance. If the participant is not already receiving other services the case manager should make the participant aware of the services for which he or she may be eligible and offer to refer the participant to the nearest access point. Potential benefits may include, but are not limited to:

- Income Assistance;
- Supplemental Food Assistance;
- Vocational and rehabilitation counseling;
- Employment and training service;

- Educational assistance;
- Health care services including Medicare, Medicaid or other assistance with health insurance.

Income assistance, employment, training, and educational resources are especially important for the target population of the FRRC. Participants will need to establish regular incomes to support the program's primary goal of housing stability. Health care benefits will offer participants mental and physical health services that are not currently being addressed and may be able to help address on-going needs when case management services have ended.

Case Managers should attempt to maximize the number of participants served by using FRRC supportive services grant funds only when necessary. By leveraging available public resources to keep participants in housing, the grantee will ensure that participants are given the highest level of support possible while efficiently utilizing FRRC resources.

Temporary Financial Assistance

Eligible Temporary Financial Assistance

Case Managers may choose to provide temporary financial assistance to participants, but it is **not** a required service. Supportive services grant funds should only be used as direct financial assistance as a last resort, after first exploring the available homeless and mainstream financial. Case Managers may choose to provide temporary financial assistance as a supplement to services provided to a participant as part of a plan to increase the participant's housing stability.

Available types of TFA, frequency and duration of TFA and available funds may vary by grants, year, and source of funding. The United Way of Forsyth County, the City of Winston-Salem and the Program Director will provide guidance and support on TFA funds available on a regular basis.

TFA funds may assist with

- Rental assistance;
- Utility-fee payment assistance;
- Deposits (security or utility);
- Moving costs;
- Transportation; and

Participants in this program who are veterans and participating in the FRRC: Veteran's Program may be eligible for additional categories of TFA including emergency supplies, child care, and general housing stability. If a case manager identifies a household with a veteran member of the household that is not otherwise being served by the FRRC: Veterans Program, they should connect the veteran family with this program to see if it is a better fit or if additional resources are available.

Furniture

In general, except for veterans participating in SSVF funded programs, furniture IS NOT an eligible expense under most temporary financial assistance programs. However, from time to time private funds are available to assist with vouchers for furniture from the Barnabas Network or similar non profit organizations. If a household has no other options for furniture, case managers may check with the Director of the Rapid Re-housing program to see if furniture vouchers are available.

Temporary Financial Assistance Eligibility Test

When deciding whether to provide temporary financial assistance, consider this:
“Would this household be homeless *but for* this assistance?”

Minimum level of Temporary Financial Assistance

Case Managers should focus on the most critical threats to the participant’s housing stability in providing the “minimum necessary” level of assistance. Case Managers should keep in mind that FRRC funds for temporary financial assistance are limited. Providing a disproportionate amount of temporary financial assistance to one participant will limit the total number of participants able to serve. As stated in the previous section, (‘Assistance in Obtaining and Coordinating Other Public Benefits’), all participants should be referred to mainstream income supports for which they may qualify. By leveraging and utilizing public sources of emergency and ongoing financial assistance, case managers can minimize the temporary financial assistance payments made with FRRC grant funds, and maximize our system’s ability to serve many households.

Household Caps on Temporary Financial Assistance

Pursuant to the Federal Regulations and the local Consolidated Plan for Winston-Salem/Forsyth County, payments of temporary financial assistance for households participating in the Forsyth Rapid Re-housing Collaborative programs for rapid re-housing assistance shall be made within the following guidelines:

- 1) As a condition of receiving temporary financial assistance (but not on housing search assistance) the head of household must consent to receive case management services and comply with their housing stabilization action plan. This plan shall be created as a contract between the case manager and the head of household. Rapid re-Housing case management services may be provided without providing temporary financial services.
- 2) Temporary Financial Assistance for housing related expenses shall only be provided when the household’s income is insufficient to cover their basic living expenses as determined during case management assessments.
- 3) When a household is accepted into a FRRC program the household shall be eligible for temporary financial assistance covering 100% of housing related expenses (rent, utilities and related deposits) depending on established TFA limits and funding availability.

Temporary Financial Assistance determinations by household size and chronic status: Households of 1-2 individuals can receive TFA of up to \$2900

Households of 3 or more individuals can receive TFA of up to \$3800

Households documented as chronically homeless can receive TFA of up to \$6900

Households deemed as highly vulnerable families can receive TFA of up to \$8300

If the Rapid Re-Housing Case Manager determines that the household needs additional temporary financial assistance to achieve housing stability they must obtain an exception through the Senior Director of Housing Strategies to increase temporary financial assistance

- 4) . In no case shall a household be authorized for more than 12 months of any rapid re-housing services. If a household can not achieve housing stability within this time frame they must be re-assessed by the Coordinated Assessment Team for additional services.
- 5) If a household needs additional case management services beyond the time in which they are receiving temporary financial services, they may continue to receive case management only services without additional authorizations, up to 24 months of total services.

Requests for authorization of Extension of Temporary Financial Service

Requests for an extension of service shall provide documentation identifying the barriers to housing stability and the plan to address them. Factors to be considered for an extension shall include:

- 1) Status of any pending disability claim;
- 2) Household progress on securing employment;
- 3) Health conditions of wage earners in household which affect employment status;
- 4) Health conditions of other household members which impact wage earners employment status;
- 5) Other factors which significantly impact the households' ability to be financially self-sufficient.

Restrictions on Payments

Temporary financial assistance payments **cannot** be paid to the participant and must be paid directly to a third party vendor on behalf of a participant.

Prior to a check being cut to a vendor, United Way of Forsyth County or the must have on file a W-9 form. Refusal to submit the W-9 shall delay or prohibit payment, and may be grounds for The United Way to report the vendor to the IRS.

Documentation Required

Case Managers must maintain records that justify the provision of temporary financial assistance in the client files. All temporary financial assistance which is to be paid for with COC, ESG or SSVF funds will be paid by either United Way of Forsyth County and not by the participating agency, unless prior written permission is given by the Program Director.

Case managers may request checks for eligible temporary financial assistance by submitting the required spreadsheet and supporting documentation to the Program Assistant, Housing Strategies at United Way or the Director of Housing Services at United Way. All requests for financial assistance must contain the Case Manager's signature and that of a supervisor at the case managers' home agency. The requests must include accurate information about the amounts of funds requested, the amount and duration of funds received by the household in prior months, and have adequate supporting documentation. Without this information their will be delays in processing the payments.

Prior to issuing checks for TFA the Finance Assistant and Program Director will review the request for all documentation and expense eligibility.

Check Request Schedule

For checks from ESG, SSVF and other funds managed by United Way:

In order to expedite the process of issuing TFA checks to vendors, it is requested that case managers submit completed requests to the assigned staff on designated days. Checks will be issued within 24 hours.

<u>Agency / Program</u>	<u>Staff</u>	<u>Day</u>
ESR	Program Assistant, Housing Strategies	close of business Thursday
SSVF	Director of Housing Services	close of business Friday
Bethesda Center	Program Assistant, Housing Strategies	close of business Monday
Goodwill, Family Services, Salvation Army	Director of Housing Services	close of business Tuesday

In case of emergency, case managers can request permission for checks at other times from the Program Director.

Participant Eligibility Determination and Documentation Requirements

It is important that each participant file includes documentation that verifies the participant meets Program eligibility and that each expenditure of TFA is clearly within the program guidelines. Case Managers will be required to keep records documenting household eligibility and supporting each TFA request, as well as documentation on case plans and progress.

The Director of the Rapid Re-Housing Collaborative shall provide guidance and monitoring on file maintenance and documentation. In order to insure all participating agencies are meeting the State and Federal standards, she will request on occasion to inspect files.

In addition, all files are subject to monitoring by City, State and Federal officials upon request.

In order to ensure that all collaborative partners meet the expected standards, files are to be kept updated on at least a weekly, preferably daily basis.

Household Eligibility

In order to be eligible for participation in the Forsyth Rapid Re-Housing Collaborative programs a household must meet the threshold requirements. These requirements include:

- 1) The Household's total income must not exceed 30% of the area median income;
- 2) The Household must lack sufficient economic and social resources to obtain and maintain permanent housing ("but for" test- But for this assistance, would this household remain homeless)
- 3) Meet the requisite definition of literally homeless, equivalent to HUD's category 1 Homeless, including victims of domestic violence.

Residency Requirements

There shall be no requirements for a literally homeless household to reside in either Forsyth County or a Forsyth County shelter prior to admission to the program. Households that intend for Forsyth County to be their permanent residence are eligible for assistance. If a household is residing at a shelter outside of Forsyth County either for purposes of safety or because no appropriate shelter was available in Forsyth, but intends for Forsyth County to be their permanent residence may be eligible for services.

Determining Income Eligibility

The FRRC Program defines an eligible household as one whose annual income, as determined in accordance with 24 CFR 5.609, **does not exceed 30 percent of the median income** for an area or community.

The median income for an area or community will be determined using the income limits most recently published by HUD for programs under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f). HUD's current income limits can be found at <http://www.huduser.org/portal/datasets/il.html>. The case manager must establish the size of household to verify that the household meets the income eligibility requirement.

Income Definition

The income definition contains income "inclusions" (types of income to be counted) and "exclusions" (types of income that are not to be counted as income) for determining eligibility. Case Managers should follow the income guidelines for the Housing Choice Voucher Program found at 24 CFR Part 982.

The following types of income must be counted (inclusions) when calculating annual income:

- Earned Income --Wages, Salaries, etc. for any adult member of the household (note: wages that are garnished are included as earned income)
- Self-Employment/Business Income
- Interest & Dividend Income
- Pension/Retirement Income
- Unemployment & Disability Income (excluding lump sum payments)
- TANF / Public Assistance, including the portion of the grant designated for child(ren)
- Alimony and Child Support Income
- Armed Forces Income
- G.I. Bill Housing Stipend

The following types of income are NOT counted (exclusions) when calculating current gross income:

- Income of Children
- Inheritance and Insurance Income
- Medical Expense Reimbursements
- Income of Live-in Aides
- Student Financial Aid, including G.I. Bill Student Financial Aid
- Armed Forces Hostile Fire Pay
- Self-Sufficiency Program Income
- Other Income (i.e., temporary, non-recurring or sporadic income)

- Reparations
- Income from full-time students
- Foster Care Income
- Adoption Assistance Payments
- Deferred and Lump Sum Social Security & SSI payments
- Income Tax and Property Tax refunds
- Home Care Assistance
- Veterans Retraining Assistance Program (VRAP) assistance
- Other Federal Exclusions
- Food Stamps

Some types of excluded income, such as tax refunds, could be counted by grantees to be household assets. Grantees are required to include in the calculation of annual income any interest or dividends earned on assets held by the family. For additional information on determining income from assets, please see the below “Determining Income from Assets” section.

Income Calculation

After determining and documenting specific sources of income that must be included in the income calculation for each household, grantee then calculate the household’s (not just the Veteran’s) annual income.

Annualizing Wages and Periodic Payments

When calculating income based on hourly, weekly or monthly payment information, add the gross amount earned in each pay period for which there is documentation and divide by the number of pay periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- Hourly Wage multiplied by hours worked per week multiplied by 52 weeks
- Weekly Wage multiplied by 52 weeks
- Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- Monthly Wage multiplied by 12 months

Case Managers may choose among the following two methods of calculating annual income:

Calculating projected annual income by annualizing *current* income

OR

Using information available to average *anticipated income* from all known sources when the sources are expected to change during the year.

For example, a person who works as a teacher’s assistant nine months annually and receives \$1,300 per month. During the summer recess, the person works for the Parks and Recreation Department for \$600 per month. Grantees may calculate the Forsyth Rapid Rehousing Collaborative family’s income using either of the following two methods:

Calculate Annual Income Based on Current Income:

\$15,600 (\$1300 x 12 months). If recertification falls during summer recess, the grantee would recalculate the family’s income during the summer months at a reduced annualized amount of \$7200 (\$600 x 12 months).

Calculate Annual Income Based on Average Experience:

\$11,700	(\$1300 x 9 months)
+ 1,800	(\$ 600 x 3 months)
\$13,500	

Using the first method requires documentation of only one source of income; under the second method, the family’s intake file would include documentation of both sources of income.

If a household’s periodic benefits and/or period of employment are capped, grantees should not annualize benefits/pay beyond the maximum level of benefit/pay that can be received. For example, a client receives \$100 of unemployment per week, but unemployment is capped at \$4,000 per year. The client’s annualized unemployment benefits should be calculated at \$4,000, and **not** $\$100 * 52 = \$5,200$. Another example, the household is employed for a quarter and will receive \$500/week. The client’s annualized pay should be calculated at \$6,000 and **not** $\$500 * 52 = \$26,000$.

However, to the extent that there is certainty about expected income, future income should be taken into account when determining whether a household has other financial resources.

Remember, case managers must assess all circumstances and document that the household would be homeless **but for** the assistance. As such, case managers should carefully evaluate the circumstances and probability of future income. For example, while a seasonal worker may expect to earn income during an upcoming season, if s/he has no promise of future employment, the potential of future employment should not be counted as a resource. In contrast, if a school teacher has a promise of future employment (by way of a renewed employment contract), the potential of future employment should be accounted for in the assessment of other financial resources. This is not to say that the school teacher in the example would be automatically determined ineligible. Rather, grantees should determine when the employment opportunity will take effect (i.e. when the income will be earned) and create a financial assistance plans that account for an eligible Forsyth Rapid Rehousing Collaborative family’s financial resources.

Documentation of a household’s annual income and the percent of AMI that income represents (not to exceed the maximum of 30% of AMI) must be maintained in the participant’s file as documentation of eligibility.

Summary of Asset Inclusions and Exclusions

Asset Inclusions	Asset Exclusions
1. Amounts in savings and checking accounts	1. Necessary personal property, except as noted in Inclusion #9.
2. Stocks, bonds, savings certificates, money market funds and other investment accounts	2. Interest in Indian trust lands.
3. Equity in real property or other capital investments. Equity is the estimated current market value of the asset less the unpaid balance on all loans secured by the assets and reasonable costs (such as broker fees) that would be incurred in selling the assets.	3. Assets that are part of an active business or farming operation.

Asset Inclusions	Asset Exclusions
4. The cash value of trusts that may be withdrawn by the family.	4. NOTE: Rental properties are considered personal assets held as an investment rather than business assets unless real estate is the applicant's / tenant's main occupation.
5. IRA, Keogh and similar retirement savings, even though withdrawal would result in a penalty.	5. Assets not controlled by or accessible to the family and which provide no income for the family.
6. Some contributions to company retirement/ pension funds. Note the discussion below on accessibility of the funds.	6. Vehicles especially equipped for the disabled.
7. Assets, which although owned by more than one person, allow unrestricted access by the applicant.	7. Equity in owner-occupied cooperatives and manufactured homes in which the family lives.
8. Lump sum receipts such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims.	
9. Personal property held as an investment such as gems, jewelry, coin collections, antique cars, etc.	
10. Cash value of life insurance policies.	
11. Assets disposed of for less than fair market value during the two years preceding certification or recertification.	

NOTE: A key factor in whether or not to include an asset in the calculation of annual income is whether any member of the family has access to the asset.

Assets Calculation Example

Compare Actual Income from Assets to Imputed Income from Assets

Applicant has \$7,900 in assets. (Assume passbook rate of 3.5 percent.)

Applicant actual income from assets is paid at 1.5% simple interest annually = \$119. Assets:
\$ 7,900

HUD-determined passbook rate	x .035
Imputed income from assets	\$ 277

Compare actual interest of \$119 to imputed interest of \$277. The actual interest of \$277 (the greater of the two) will be used as income from assets in the calculation of annual income.

Additional Guidance on Calculating the Value of Assets and Income from Assets

Contributions to Company Retirement/Pension Funds

While a participant is employed, count as an asset only amounts the participant could withdraw from a

company retirement or pension fund without retiring or terminating employment.

After retirement or termination of employment, count as an asset any amount the employee elects to receive as a lump sum from the company retirement/pension fund.

Include in *annual income* any retirement benefits received through periodic payments.

In order to correctly include or exclude as assets any amount now held in retirement/pension funds for employed persons, the grantee must know whether the money is accessible before retirement.

Equity in Real Property

Real property includes land or real estate owned by the participant or participant household. Equity is the portion of the market value of the asset which is owned by the participant (the amount which would be available to the household if the property were to be sold). It is equal to the market value less any mortgage or loans secured against the property (which must be paid off upon sale of the property).

Calculate equity in real property as follows:

$$\text{Market Value} - \text{Loan (Mortgage)} = \text{Equity}$$

Calculate the cash value of real property as follows:

$$\text{Equity} - \text{Expense to Convert to Cash} = \text{Cash Value}$$

Expenses to convert to cash may include costs that would be paid to liquidate the asset, such as sales commissions, settlement costs, and transfer taxes.

Assets Disposed of for less than Fair Market Value

At initial certification or reexamination, grantees must ask whether a household has disposed of an asset for less than its market value within the past two years. If the family has, the grantee must determine the difference between the cash value of the asset at time of sale or other disposal and the actual payment received of for the asset.

Some of the types of assets that must be considered include cash, real property, stocks, bonds, and certificates of deposit. They must be counted if the household gave them away or sold them for less than the market value. Note: Generally, assets disposed of as a result of a divorce, separation, foreclosure, or bankruptcies are *not* considered assets disposed of for less than fair market value.

VA does not specify a minimum threshold for counting assets disposed of for less than fair market value. A grantee may establish a threshold that will enable it to ignore small amounts such as charitable contributions. (HUD Handbook 4350.3, for multifamily subsidized housing, uses \$1,000 as a threshold.) Verification of assets disposed of for less than fair market value is generally done by participant certification. Grantees need verify only those certifications that warrant documentation.

Valuing Assets

Because of the requirement to include the greater of the actual interest/dividend income earned or a percentage based upon a HUD published passbook rate when assets are greater than \$5,000, the value of assets *may* affect the family's annual income.

Grantees must determine the *market value* of the asset and then calculate the *cash value* by subtracting the estimated expense required were the participant to convert the asset to cash.

Expense to convert to cash includes costs such as:

- Penalties for premature withdrawal (e.g. the 10% penalty paid when a retirement account is closed prior to retirement age, or a certificate of deposit is withdrawn prior to maturity);
- Broker and legal fees (e.g. a percentage of the value of the asset incurred in the sale of stocks, bonds, real estate, etc.); and
- Settlement costs incurred in real estate transactions (e.g. the typical percentage of sales price for settlement in the locality).

NOTE: Grantees must not require participants to dispose of assets in order to determine the costs to convert to cash. These amounts simply reflect a realistic estimate of costs and by deducting them from the market value of the asset, the imputed income from the asset is based on an amount the participant would have in hand if they converted their assets to cash.

Federal Tax Refunds Received within the Previous 12 Months

If Federal tax refunds received within the previous 12 months make up part of a household's cash assets, that part of the household's cash assets must not be counted among the household's financial resources when determining the household's eligibility or need for assistance. See "Tax Relief, Unemployment Insurance Reauthorization, and Job Creation Act of 2010," Pub. L. No. 111-312, § 728, 124 Stat. 3296, 3317.

For example, if a household applying for assistance in July 2011 has \$2000 in total assets that includes a \$500 federal income tax refund received in April 2011, no more than \$1500 of the household's total assets may be considered when determining whether the household has the financial resources and support networks needed to obtain immediate housing or remain in its existing housing or when determining the amount or type of assistance that household needs.

This exclusion does not apply to Federal tax refunds received prior to the previous 12 months or state tax refunds. If those tax refunds make up part of a household's cash assets, they are treated the same as the other cash assets.

Determining Housing Status Eligibility

As with income eligibility; upon entering the FRRC program and every three months thereafter, all participants applying (or being recertified) for assistance must undergo a housing status eligibility determination. The results must be documented in the case file. This section provides detailed information on housing status eligibility (in addition to requirements and instructions provided in Section VII.A. of this Program Guide).

Reassessment Areas

The following areas should be reassessed by grantees:

- a. **Income Eligibility:** The participant must still be at or below 30% AMI. Case Managers must recalculate and document household income as they did during the original assessment, since circumstances may have changed in the intervening months. If a household is over 30% AMI at the time it is reassessed, that household is no longer eligible.

- b. Housing Status Eligibility:** staff will evaluate a participant’s progress at the initial consultation, as well as at the recertification every 3 months to determine and document whether the household remains qualified for continued services. Case Manager should evaluate the presence of ongoing barriers to stable housing and risk factors that indicate a household continues to need assistance to prevent or end homelessness. If a change in housing status has occurred since the last recertification (for example, the household moved into permanent housing from homelessness), this change is noted in the recertification paperwork. The household’s housing status category does not need to be reclassified.
- c. Other Resources / Support Networks (“But For”) Eligibility:** case managers should again assess and document whether the household lacks the financial resources and support networks needed to obtain housing or remain in their housing.
- d. Confirmation of Veteran Family Status:** The case manager should confirm whether the participant or any other member of their household is a veteran. If a member of the household is identified as a veteran, the case manager will work to ensure that the Veteran is connected to the Veteran Administration local medical center.

Adjusting Assistance at Reassessment

As explained above, the appropriate level of supportive services and temporary financial assistance, if given, should be based on a participant’s specific needs. It is important for case managers to consider during each reassessment if circumstances have changed and how much assistance a household actually needs for housing stability at that point. Assistance levels for services or financial assistance can then be adjusted to be greater or less than included in the original plan. (For more information on different types of subsidies, see “Designing and Delivering HPRP Financial Assistance”, available on the HRE at: http://www.hudhre.info/documents/HPRP_FinancialAssistance.pdf.)

If a participant becomes ineligible to receive supportive services with rapid re-housing funds during the recertification process, the grantee is required to provide the participant with information on other available programs or resources.

Case File Documentation Requirements

Case Managers are responsible for maintaining case files for each participant household. Case files are subject to inspection by representatives of the Federal Government, State official, during the monitoring visits, case files will be inspected for the following:

- Intake Screening
- Verification of participant eligibility (Veteran status, household income, and housing status)
- Housing stability plan
- Provision of the types of supportive services and, if applicable, types of financial assistance
- Recertification and reassessment (at least once every 90 days for all participants)
- Rent reasonableness determination, if applicable
- Fair Market Rate Assessment, if applicable
- Housing inspections, if applicable

Documentation Standards

Case Managers are responsible for verifying and documenting the eligibility of all households prior to providing assistance. They are also responsible for maintaining this documentation in the participant's case file once approved for assistance. Case Managers with insufficient case file documentation may be found out of compliance with program regulations..

Minimum acceptable types of documentation vary depending on the type of income or particular housing status and circumstance being documented. General documentation standards, *in order of preference*, are as follows:

- A. Written Third Party** — Verification in writing from a third party (e.g. individual employer, Social Security Administration, welfare office, emergency shelter provider, etc.) either directly to staff or via the family is most preferred. Third party verification of income, such as a deposit slip for a paycheck, might show income after deductions have been made; grantees must document gross income, before any deductions.
Written third-party documentation may include completion of a standardized form, such as a verification of income statement.
- B. Oral Third Party** — Verification from a third party (e.g. individual employer, Social Security Administration, welfare office, etc.) provided by the third party over the telephone or in-person directly to staff. Oral third party verification is acceptable only if written third party verification cannot be obtained in time to resolve the housing crisis. Staff must document reasons why third party written verification could not be obtained in the participant file, per the requirements in the tables below
- C. Participant Self-Declaration** — An affidavit of income and/or housing status as reported by the household is allowable, but is only acceptable if written or verbal third party verification cannot be obtained. Self-declaration of housing status (e.g., eviction) should be rare. Staff must document reasons why third party written or oral verification could not be obtained in the participant file, per the requirements in the tables below.

The Program Director may review program participant files and documentation through periodic monitoring and be sure it is sufficient to document the household meets all eligibility criteria. Remember, specifically for housing status, determining eligibility can be a multi-level process. Veteran families must meet ALL criteria and evidence of this must be present in the case file.

HMIS Participation requirements

All subcontractors are required to participate in the North Carolina implementation of HMIS. They must keep records of all client services in this database.

Case Managers must have client data in the CHIN system by no later than the 4th day of every month.

Data Quality Standards

NCHMIS provides monthly data quality reports for programs. All case managers are encouraged to have 100% data quality. Any subcontractor which has a data quality score from NC HMIS below 95% will receive a written warning from the Program Director. If the data quality issues are not resolved within 30 days, the Program manager may work with the subcontractor to develop a data improvement plan.

Participant Fees

Programs may not charge a fee to participants for providing supportive services that are funded using funds from a supportive services grant. *Note: this prohibition does not prevent grantees from requiring participants to cost-share, with a grantee, any expenses for which temporary financial assistance is provided.*

Participant Safety and Critical Incident Reports

A critical goal of the Program is to ensure the safety of all participants, supportive service coordinators and their staff. Case Managers are encouraged to develop a comprehensive safety plan to maintain the safety of participants and staff if a staff member of either the grantee or subcontractor becomes aware of a health or safety issue related to the participant, including unsafe accommodations, the grantee must report the issue to the appropriate authorities. Grantees and subcontractors are expected to comply with all applicable laws.

Habitability Standards

Any unit for which FRRC funds are used must meet local habitability standards, and documentation of inspection must be maintained in the clients file. Rapid Rehousing or Supportive Services for Veteran Families staff shall, on behalf of a participant moving into a new (different) housing unit conduct initial and any appropriate follow-up inspections of the housing unit into which the participant will be moving.

Confidentiality

All program staff are required to maintain confidentiality of records kept on participants. Grantees and subcontractors must comply with all applicable federal and local laws to assure the confidentiality and security of participant's physical and electronic records.

Program staff that provides family violence prevention or domestic violence treatment services must establish and implement additional procedures to protect participants by ensuring the confidentiality of:

- (1) Records pertaining to any individual provided services, and
- (2) The address or location where the services are provided.

Domestic Violence Policy

If a participant is identified at the initiation of services as a victim of domestic violence the case manager will take all necessary steps to include in their housing stability plan a domestic violence safety plan. If the participant is willing to be connected to a provider that specializes in serving victims of domestic violence the case manager shall assist the client in connecting to that provider.

If a case manager finds that a member of a participating household that they are currently working with is perpetrating domestic violence against another adult member of the household they must contact the program director immediately and the case manager and the Program Director shall determine on a case by case basis how best to serve the household, with the primary focus of creating a service plan that protects both the safety and confidentiality of all members of the household. Under no circumstances will one case manager be allowed to continue to serve both adult members of the household if there is domestic violence occurring within the family.

If there is violence or abuse which is revealed to be occurring against a child in the FRRC participant household, the case manager must report such abuse to the Department of Social Services, as required by law.

Releasing Participants from Program

Clients will be released from the program under the following conditions:

The Case Manager and participating household agree that the household has received the agreed to services and achieved housing stability.

The participating household does not respond to reasonable contact with the case manager. Prior to terminating a household for lack of contact the case manager must attempt to contact the household both in writing and in person, and give clear instructions that if the household does not contact the program staff within a reasonable time frame, which is clearly set forth in the letter, that the household will be terminated from the program.

In the event a participant violates a grantee's program requirements, a grantee may stop providing assistance to the participant. The program participant must receive written notification of the reason for termination. Case Manager may resume assistance to a participant whose assistance was previously suspended.

When a household is terminated from the program for any reason other than mutual consent, the case manager must:

- (1) Provide written notice to the participant containing a clear statement of the reasons termination
- (2) A review of the decision, in which the participant is given the opportunity to present written or oral objections to either the case manager's supervisor within their agency or the FRRC Program Director;
- (3) Prompt written notice of the final decision to the participant. Subcontractors are encouraged to follow their own internal process for reviewing terminations so long as they meet the above minimum standard.

COMPLAINTS AND APPEALS

INTRODUCTION

A. COMPLAINTS & APPEALS

Complaints may arise when an applicant or program participant disagrees with an action or inaction on the part of the program. When complaints are received from applicants, participants, landlords, or members of the public, the appropriate representative of the program will respond promptly. All complaints and responses will be documented. The Program may request that complaints be put in writing, but must allow the option of oral complaints and appeals. Complaints may include, but not be limited, to the following types:

Complaints from households: If an applicant or participating household disagrees with an action or inaction of the program, the complaint initially will be reviewed by the front-line staff. If a complaint is not resolved, it will be referred to a supervisor of the sponsor agency.

Complaints from owners: If a property owner or property manager disagrees with an action or inaction of the program or a participating household, the complaint initially will be reviewed by the front-line staff. If a complaint is not resolved, it will be referred to a supervisor of the sponsor agency.

Complaints from staff: If a program staff person reports an owner or participant either violating or not complying with program rules, the complaint will be referred to the Supervisor.

Complaints from the general public: Complaints or referrals of complaints from persons in the community in regard to the program, a participant or an owner initially will be reviewed by the front-line staff. If a complaint is not resolved, it will be referred to a supervisor of the sponsor agency.

At its discretion, after review of a complaint by the supervisor, the agency may refer a complaint to the Case Review Team for review and a recommendation.

B. DENIALS AND TERMINATIONS

Households are considered applicants once they have participated in an interview and signed required forms. Applicants who are denied assistance must be notified by the sponsor agency in writing of the denial within ten (10) days of application. The notice must include the reason for the denial, notification of the right to appeal the decision, the procedure for requesting a review of the decision, and a time limit for requesting a review. Applicants who are denied assistance may appeal the decision.

Households are considered participants when they receive any type of program assistance. Participation in the program is terminated when assistance ends. In terminating assistance to a program participant, written notification must be provided along with notification that the participant has the right to an appeal. Written notice must include the date that assistance will end, the reason for the termination, and information on how to appeal the decision.

C. NOTIFICATIONS

Notifications from Program representatives must include the reasons for any action or inaction and must describe a procedure and time limit for request of further review. Notifications shall be issued within 10 days of receipt of any complaint or appeal.

Financial Management

The United Way of Forsyth County shall maintain all financial records and accountings for this program in accordance with its standards and procedures.

Sub-contractors may submit requests for reimbursement on a monthly basis. Requests shall not exceed budgeted amounts as set forth in the approved budget.

Approved budgets shall be provided by United Way to the subcontractors within 30 days of receiving the budget from the Veterans Administration. If there is a gap between the receipt of the approved budget and the beginning of the grant period, subcontractors may rely on the proposed budget submitted with the most recent grant application until such time as the approved budget is received from the VA.

Employee Training

All FRRC Program Staff shall be provided a minimum of 5 continuing education hours per year to ensure that their skills are of the highest caliber. Program staff are encouraged to find opportunities in the community for such training. Often there are trainings by the North Carolina Coalition to End Homelessness, HUD, Veterans Administration, and other national, state and local entities.

The Program Director will authorize the expenditure of funds to cover the costs of such training as the budget allows.

Non Discrimination Policy

The aim of this policy is to ensure equal and fair access to the FRRC for all people who meet the program criteria. No FRRC participant or their family members shall be discriminated against in selection for the program because of his/her race, religion, color, sex, gender identify, age, creed, national origin, marital status, sexual orientation, family status, or disability.

Adoption and amending Policies and Procedures

These policies and procedures shall be adopted and/or amended by agreement between the United Way of Forsyth County and its subcontractors.

Forsyth Rapid Re-Housing Collaborative Policies and Procedures

Amendments, Approved January 17, 2017 by CoC Operating Cabinet

Fair Housing

The Forsyth Rapid Re-housing Collaborative (FRRC) complies with the letter and spirit of the Fair Housing Act, and as such no person shall be denied housing or services from this program based upon their race, color, religion, national origin, sex, sexual orientation, gender identity, veteran status, familial status, and disability. No otherwise qualified person will be denied housing or otherwise discouraged from obtaining housing through this program because of his/her race, color, religion, national origin, sex, sexual orientation, gender identity, veteran status, familial status, or disability.

Pursuant to Section 504 of the Rehabilitation Act, no qualified individual with disabilities will be excluded, solely on the basis of disability from participation in or the benefits of the program or activities administered by FRRC. FRRC will provide reasonable accommodations to all applicants, residents, and employees, who need such accommodations to be able to enjoy the benefits of the services provided by the FRRC.

In assisting households in identifying and securing housing, FRRC representatives will assist clients and provide guidance in requesting reasonable accommodations from current or prospective landlords to address any disabilities of household members.

Member agencies of the Forsyth Rapid Re-housing Collaborative are required to take reasonable steps to offer persons with limited English proficiency (LEP) access to all programs and services. FRRC member staff will inform the public of the availability of language accessible programs and services. If an individual or family requesting assistance needs any program document to be available in a language other than English, staff will locate appropriate translation and interpretation services to translate the document. Also, FRRC staff will provide services without regards to the immigration status of service recipients unless otherwise required by applicable law. Therefore, unless required to do so by applicable law, FRRC staff will not ask persons requesting or receiving services about their immigration status.

How to File Housing Discrimination Complaints:

Persons seeking to file a fair housing complaint will be referred by FRRC staff to the City of Winston-Salem Human Relations Department, which investigates housing discrimination, landlord/tenant, and Limited English Proficiency complaints. To file a housing discrimination complaint, a HUD Form 903 must be completed. The form allows applicants or participants to describe their complaint and provide contact information. Complaints may be filed using one of the following options:

1. Contact the Winston-Salem Human Relations Department at (336) 734-1227 to request HUD form 903;
or
2. Visit the Human Relations office in person in City Hall at 101 North Main Street in Suite 109 to request a form and to receive assistance in completing it; or
3. Obtain and mail a complaint form to: Winston-Salem Human Relations Department, P.O. Box 2511, Winston-Salem, NC 27101.

Generally, complaints concerning housing discrimination allegations must be based on discrimination due to race, color, national origin, disability, religion, gender, or disability involving the transacting of real estate (i.e., buying or renting or attempting to buy or rent property). The Human Relations Department and Human Relations Commission accept complaints from residents of both subsidized and non-federally subsidized housing.

Upon the completion of the investigations, a final determination is made by the Human Relations Director to decide if there is reasonable cause to believe that discrimination has taken place. If reasonable cause is determined, the parties are advised that they may choose resolution before either the superior court or an administrative hearing with the Human Relations Commission. If reasonable cause is not determined, the parties are advised that there is insufficient evidence of discrimination. Despite the determination, the parties always have the right to pursue the matter with their own personal attorneys through a court of law.

Prioritization of Rapid Re-housing Financial Assistance and Services

System-wide prioritization of limited supportive housing resources, including rapid re-housing (RRH), permanent supportive housing and other resources, is accomplished through the coordinated intake and assessment process operated by the Community Intake Center which is administered by United Way of Forsyth County. Generally, RRH assistance will be provided as eligible households with needs present themselves, subject to availability of the resources. However, when requests exceed available resources, clients will be served in order of highest assessed needs, based upon the results of application of the standard assessment tool (e.g. the Vulnerability Index-Service Prioritization Decision Assistance Tool or VI-SPDAT).

Household Caps on Temporary Financial Assistance

Pursuant to the Federal Regulations and the local Consolidated Plan for Winston-Salem/Forsyth County, payments of temporary financial assistance for households participating in the Forsyth Rapid Re-housing Collaborative (FRRC) programs for rapid re-housing assistance shall be made within the following guidelines:

- 6) As a condition of receiving temporary financial assistance (but not on housing search assistance) the head of household must consent to receive case management services and comply with their housing stabilization action plan. This plan shall be created as a contract between the case manager and the head of household. Rapid re-Housing case management services may be provided without providing temporary financial services.

- 7) Temporary Financial Assistance (TFA) for housing related expenses shall only be provided when the household's income is insufficient to cover their basic living expenses as determined during case management assessments.
- 8) When a household is accepted into a FRRC program the household shall be eligible for temporary financial assistance covering 100% of housing related expenses (rent, utilities and related deposits), subject to funding availability and the following caps on rapid re-housing financial assistance:
 - Households of 1-2 individuals can receive TFA of up to \$2900
 - Households of 3 or more individuals can receive TFA of up to \$3800
 - Households documented as chronically homeless can receive TFA of up to \$6900
 - Households deemed as highly vulnerable families can receive TFA of up to \$8300

During the period of rapid re-housing financial assistance, households shall not be required to pay any portion of rent or utility costs. However, if the household has income and requests to share in the cost of rent and/or utilities, and if the household and case manager agree in writing, the household may choose to pay up to 30% of its adjusted gross income for rent and/or utility costs during the period of rapid re-housing financial assistance.

If the Rapid Re-Housing Case Manager determines that the household needs additional temporary financial assistance to achieve housing stability they must obtain an exception through the Senior Director of Housing Strategies to increase temporary financial assistance

- 9) In no case shall a household be authorized for more than 12 months of any rapid re-housing services. If a household cannot achieve housing stability within this time frame they must be re-assessed by the Coordinated Assessment Team for additional services.
- 10) If a household needs additional case management services beyond the time in which they are receiving temporary financial services, they may continue to receive case management only services without additional authorizations, up to 24 months of total services.