

**IA-502 Des Moines/Polk County
Continuum of Care**

**Standards for Providing Assistance in
Continuum of Care and
Emergency Solutions Grant Programs**

DISCLAIMER: The following program standards are **NOT** a comprehensive list of regulations governing the COC- and ESG-funded programs described within. Programs should consult the relevant Code of Federal Regulations (CFR) governing their funding source (CoC or ESG) and their grant contract for additional regulatory guidance.

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BACKGROUND AND PURPOSE

The U.S. Department of Housing and Urban Development (HUD) Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009. The HEARTH Act reauthorizes the McKinney-Vento Homeless Assistance Act of 1987, but with some important changes.

The overall goal of the HEARTH Act is to make homelessness rare, brief, and non-recurring by reducing the duration of time people spend homeless and reducing recidivism back into homelessness. Currently, the IA-502 Des Moines/Polk County Continuum of Care (DSM/Polk CoC) has funding through the Emergency Solutions Grants (ESG) Program and the Continuum of Care (CoC) Program to undertake projects that work toward this goal.

The [Emergency Solutions Grant \(ESG\) Interim Rule, 24 CFR 576](#), was published on December 5, 2011 and took effect on January 4, 2012. An updated version of the ESG Interim Rule was published in the Federal Register on April 1, 2017 incorporating the addition of section 576.409 regarding protections for victims of domestic violence, dating violence, sexual assault or stalking which were established in response to the Violence Against Women Reauthorization Act of 2013. The purpose of the regulation is to:

- Change the name of the program from the Emergency Shelter Grant program to the Emergency Solutions program;
- Place greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness;
- Expand the homelessness prevention component of the program; and
- Create a new rapid rehousing component.

24 CFR 576.400(e)(3) of the ESG Interim Rule requires the recipient to have written standards for providing ESG assistance and must consistently apply those standards for program participants. At a minimum, these written standards must include:

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG);
- Standards for targeting and providing essential services related to street outreach;
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see § 576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid rehousing assistance;

- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

The [Continuum of Care \(CoC\) Interim Rule, 24 CFR 578](#) was published on July 31, 2012 and took effect on August 30, 2012. The purpose of the regulation is to:

- Consolidate the Supportive Housing Program (SHP), Shelter Plus Care Program (SPC) and the Section 8 Moderate Rehabilitation Program;
- Codify the CoC structure & process
- Promote a community wide commitment to the goal of ending homelessness;
- Provide funding to quickly rehouse homeless individuals and families while minimizing trauma and dislocation;
- Promote access to and effective utilization of mainstream benefits;
- Optimize self-sufficiency.

[The CoC Interim Rule](#) provides regulatory guidance on the implementation of the CoC program. 24 CFR 578.7(a)(9) mandates that the DSM/Polk CoC establish and consistently follow written standards for providing Continuum of Care assistance, in consultation with recipients of the [Emergency Solutions Grant \(ESG\) Program](#), (i.e., the City of Des Moines' Community Development Department). At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals 'and families 'eligibility for assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance; and
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

The goals of the written standards are to:

- Development of written policies and procedures so the ESG and CoC-funded projects, as well as the DSM/Polk CoC are in compliance with 24 CFR 576 (ESG interim rule) and 24 CFR 578 (CoC Program interim rule),
- Program accountability to individuals and families experiencing homelessness.
- Ensure the uniformity of program practices and participants' expectations of and experiences in ESG/CoC-funded programs.

- Ensure project staff competence and training specific to the target population being served and their baseline knowledge of best practices.
- Model policy guidelines for RRH programs.
- Creating consistency among all ESG/CoC-funded programs and collaboration within the community.
- Ensuring transparency of DSM/Polk CoC priorities, policies, and performance metrics.

Under the purview of HUD regulations and guidelines, the DSM/Polk CoC, in consultation with the City of Des Moines' Community Development Department, has the discretion to set local standards regarding rental assistance amounts, length of assistance available for participants, and other project components as necessary.

All projects receiving CoC Program and/or ESG Program funds must comply in full with the applicable standards described in this manual. Additionally, all recipients and subrecipients of this funding must meet all minimum requirements in the CoC interim rule.

Recipients and sub-recipients of CoC Program and ESG funds may develop additional standards for administering program assistance, **but these additional standards cannot be in conflict with those established by the CoC Program Interim Rule and by the DSM/Polk CoC in this document. In addition, projects may not establish additional eligibility requirements beyond those specified here and those required by other funders, including but not limited to: Department of Human Services, Runaway and Homeless Youth and the Veteran's Administration.**

PROGRAM OVERVIEW

EMERGENCY SOLUTIONS GRANT PROGRAM

The [Emergency Solutions Grant Interim Rule](#) broadened existing emergency shelter and homelessness prevention activities, placing greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness by expanding prevention as an eligible use and adding a rapid rehousing component. ESG funds are authorized and intended for rapid re-housing, homelessness prevention, and emergency shelter. The interim rule updated the annual action plan requirements to include written standards for the provision of ESG assistance and performance standards for evaluating ESG activities.

ESG funds can be used for a variety of services, including: HMIS, Street Outreach, Emergency Shelter and Rapid Rehousing which includes short- or medium-term Rental Assistance, Housing Search and Placement, Utility Arrears, and Housing Stability Case Management. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. The City of Des Moines' Community Development Department is the Recipient of ESG funds and grants the funds to eligible organizations referred to as subrecipients.

CONTINUUM OF CARE PROGRAM

The CoC Program funds projects that provide housing and supportive services to households with and without children experiencing homelessness. Projects funded under the CoC Program seek to assist households with attaining and sustaining permanent housing as quickly as possible. CoC Program funds are currently used in the DSM/Polk CoC to support Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), Joint Transitional

Housing-Rapid Rehousing (TH-RRH) for youth, Homeless Management Information System (HMIS), and Supportive Services Only for Coordinated Intake (SSO-CI) projects.

YOUTH HOMELESSNESS DEMONSTRATION PROGRAM

In 2019, the U.S. Department of Housing and Urban Development (HUD) selected the Des Moines/Polk County CoC to participate in the Youth Homelessness Demonstration Program (YHDP) with a goal of developing and implementing an innovative plan to end youth homelessness. This plan was written and developed through 2019 and 2020 in collaboration with youth leaders and community partners. Central to the plan’s creation is a focus on equity through the empowerment of youth with lived experience and investing in collaborative community supports for youth and young adults. Through a community-driven selection process, Anawim Housing, Iowa Homeless Youth Centers, Primary Health Care, and Children and Families of Iowa were selected to receive funding to provide housing and supportive services for young people under 25. The DSM/Polk County CoC’s Youth Homelessness Demonstration Program began serving youth in October 2020.

STANDARDS FOR ALL PROJECT TYPES

The DSM/Polk CoC practices a person-centered model that strongly incorporates participant choice and inclusion, including, but not limited to, persons experiencing chronic homelessness, single adults and childless couples, veterans, youth ages 18-24 (and parenting youth ages 18-24), households with children, victims of domestic violence or other life-threatening interpersonal violence, and households with members who have HUD-defined disabilities.

GUIDING PRINCIPLES

The following Guiding Principles are expected to be incorporated in the policies of, and followed by, agencies being funded with local ESG and/or CoC grants.

HOUSING FIRST

- *Housing First* is a programmatic and systems approach that prioritizes providing permanent housing to people experiencing homelessness quickly without preconditions or service participation requirements, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life.

Core Elements of Housing First at the Project Level

Few to no programmatic prerequisites to permanent housing entry – People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety¹,

¹ Per HUD guidance, Recovery programs at a project level can limit entry to persons who are not currently using drugs or alcohol and are committed to living in a sober environment. The key component to staying aligned with Housing First, as a systems approach, is that the participant has sought out this type of program versus it being the only option presented to

completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the program. People are also not required to first enter a transitional housing program in order to enter permanent housing

Low barrier admission policies – Permanent supportive housing’s admissions policies are designed to “screen-in” rather than screen-out applicants with the greatest barriers to housing, such as having poor credit or financial history, no or very low income, poor or lack of rental history, past evictions, or minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”²

Supportive services are voluntary but can and should be used to persistently engage tenants to ensure housing stability - Tenants are not required to participate in services as a condition of program entry or ongoing tenancy. Supportive services are proactively offered to help tenants achieve and maintain housing stability. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information. Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants’ lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.

Practices and policies to prevent lease violations and evictions – Housing First supportive housing programs should incorporate practices and policies that prevent lease violations and evictions among tenants. For instance, program policies consistent with a Housing First approach do not consider alcohol or drug use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with illegal activity (e.g. selling illegal substances.) Housing First models may also have policies that give tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant’s income. For example, rather than moving towards eviction proceedings due to missed rent payments, programs may allow tenants to enter into payment installment plans for rent arrearages or offer money management assistance to tenants. Every effort is made to provide a tenant with the opportunity to transfer from one housing situation or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

- People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy, and building and apartment units include special physical features that accommodate disabilities.
- Housing and service goals and plans are highly tenant-driven.
- Projects that cannot serve a household work through the coordinated entry process to ensure that the household has access to other housing and services such as: prevention assistance, homeless dedicated housing and services, and community-based affordable housing.

them. Additionally, Recovery programs should accept participants at any stage of their recovery and have minimal barriers to entry so that income requirements, criminal records, or eviction histories are not required for program entry

² “Housing readiness” is when a project subordinates access to permanent housing with other requirements:

HOUSING FOCUSED

- Assistance provided to households at-risk of or experiencing homelessness is focused on moving to and maintaining permanent housing.

PERSON-CENTERED

- A trauma-informed approach that is dignified, safe, and incorporates participant choice is utilized.
 - Assistance is allocated effectively and efficiently, linking households as quickly as possible to the most appropriate intervention to achieve:
 - a. A reduction in the number of households experiencing homelessness
 - b. A Reduction in the length of time households experience homelessness
 - c. A Reduction in returns to homelessness (recidivism)
 - Each client is treated as a unique individual with unique needs and strengths. Space is created to support individualized paths to permanent housing.

POSTIVE YOUTH DEVELOPMENT (PYD)

PYD is an intentional, prosocial approach that engages youth within their communities, schools, organizations, peer groups, and families in a manner that is productive and constructive; recognizes, utilizes, and enhances young people's strengths; and promotes positive outcomes for young people by providing opportunities, fostering positive relationships, and furnishing the support needed to build on their leadership strengths. Positive Youth Development entails:

- Physical and psychological safety and security
- Clear expectations for behavior, as well as increasing opportunities to make decisions, to participate in governance and rule-making, and to take on leadership roles as one matures and gains more expertise
- Emotional and moral support
- Supportive adult relationships
- Opportunities to form close, durable human relationships with peers that support and reinforce healthy behaviors
- A sense of belonging and personal value
- Opportunities to develop positive social values and norms
- Opportunities for skill building and mastery
- Opportunities to develop confidence in their abilities to master their environment
- Opportunities to make a contribution to their community and to develop a sense of mattering

STRENGTHS-BASED

- An asset-based approach that focuses on the inherent strengths of participants and deploys these personal strengths to aid in the achievement of the participants' goals. Specifically:
 - Every individual, group, family, and community have strengths.

- Trauma, illness, and struggle may be injurious, but they may also be sources of challenge and opportunity.
- There is no limit to a person’s growth, achievement, or success.
- We best serve participants by collaborating with them.
- Every environment is full of resources.
- Strong links between families, schools, and broader community resources

FAMILY ENGAGEMENT

Youth-centered programs will offer young people healthy and mediated opportunities to reunite with family and friends, when desired. For youth experiencing housing instability, family engagement can provide a crucial sense of belonging and nurturing.

YOUTH CHOICE

Youth voice and choice are critical in youth-centered programs to ensure authentic youth collaboration and better long-term outcomes for young people. This practice not only improves housing outcomes but provides youth with the tools and confidence they need to be successful in other areas of life.

SOCIAL AND COMMUNITY ENGAGEMENT

Youth-centered programs work to ensure youth feel a sense of connection and integration in Greater Des Moines. Projects will create opportunities for community connection, socialization, and skill building to help young people develop a sense of purpose and connection.

FAIR HOUSING AND EQUAL OPPORTUNITY

All programs receiving CoC or ESG funds must comply with the [Homeward’s Nondiscrimination Policy](#). Additional compliance is required with the non-discrimination and equal opportunity provisions of Federal civil rights laws as specified at [24 C.F.R. 5.105\(a\)](#), including, but not limited to the following:

- [Fair Housing Act](#)
- [Section 504 of the Rehabilitation Act](#)
- [Title VI of the Civil Rights Act](#)
- [Title II of the Americans with Disabilities Act](#)
- [HUD’s Equal Access Rule](#)
- Local law and state laws

- **Affirmatively Furthering Fair Housing**

Organizations receiving CoC Program and ESG Program funding must have non-discrimination policies in place and shall provide housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability. Further, these organizations shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws.

Programs can access the City of Des Moines’ Analysis of Impediments (found here) as a local effort to address Affirmatively Furthering Fair Housing.

- **Integration and Accessibility (Fair Housing and Equal Opportunity)**

Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. Organizations shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible.

- **Reasonable Accommodations and Modifications for Persons with Disabilities**

Organizations are required to provide reasonable accommodation and modifications for persons with disabilities. For federally-funded housing, the recipient is responsible for paying for the modification. Organizations must inform applicants during the intake process of their right to request reasonable accommodation or modification. A reasonable modification is a structural change, and a reasonable accommodation is a change to rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space. An example of a reasonable modification is installing a grab bar in the bathroom of a person with a disability, while examples of reasonable accommodations include permitting a person with a disability to have a service animal.

Reasonable accommodation also includes for “assistance animals” and should be assessed and documented per [HUD’s Office of Fair Housing and Equal Opportunity Notice FHEO-2020-01](#).

- **Discrimination Based on Actual or Perceived Gender**

HUD’s [Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule \(Equal Access Rule\)](#) requires that HUD’s housing projects be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. The rule defines “gender identity” to mean “actual or perceived gender-related characteristics.” The final rule also prohibits owners and administrators of HUD-assisted or HUD-insured housing, approved lenders in an FHA mortgage insurance program, and any other recipients or subrecipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing.

There is a limited exception to this rule: Temporary, emergency shelters and other buildings and facilities that are not covered by the Fair Housing Act because they provide short-term, temporary accommodations to adults without children may provide sex-segregated accommodations, which they sometimes do to protect the privacy and security of individuals when the buildings and facilities have physical limitations or configurations that require shared sleeping quarters or shared bathing facilities. For purposes of this rule, shared sleeping quarters or shared bathing facilities are those that are designed for simultaneous accommodation of multiple individuals in the same space. For example, a single-user bathing facility with a lock on the door is not designated for simultaneous occupancy by multiple individuals, so it is not a “shared bathing facility” for purposes of the Equal Access Rule or this rule.

Organizations should ensure that its services do not isolate, or segregate victims of domestic violence based upon actual or perceived gender identity.

- **Discrimination Based on Household Composition**

Organizations cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any member of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household.

Projects that serve households with children must serve **all types of households with children**, including households with children that are headed by a single adult or consist of multiple adults who reside together. Additionally, projects that serve households without children must serve **all types of households without children**, including households with multiple adults who reside together.

Family includes

- a pregnant woman with or without a partner who has no other children, or
- a woman, or a man, with or without a partner who has no children with them but have children in temporary foster care³

- **Preventing Family Separation**

The age and gender of a child under age 18 shall not be used as a basis for denying any family's admission to a CoC or ESG-funded project.

- **Guidance for Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities**

Under regulations at [24 CFR 5.105\(a\)\(2\)](#) and clarified in [HUD Notice: CPD-15-02](#), organizations operating ESG-single-sex emergency shelters (or other ESG- and/or CoC facilities) may not make a determination about services for one participant based on the complaints of another participant when those complaints are based on a participant's gender identity or non-conformity with gender stereotypes. The organizations must take reasonable steps to address safety and privacy concerns; the organization should provide for privacy in bathrooms and dressing areas. For instance, organizations may install privacy curtains or partitions. When deciding how to house a victim of domestic violence, an organization that provides sex-segregated housing may consider on a case-by-case basis whether a particular housing assignment would ensure the victim's health and safety. A victim's own views with respect to personal safety deserve serious consideration. The organizations should ensure that its services do not isolate, or segregate victims of domestic violence based upon actual or perceived gender identity.

- **Prioritized Subpopulations and Fair Housing Implications**

Organizations shall comply with applicable civil rights laws, including the [Fair Housing Act](#). Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness. Subpopulations may be prioritized as long as doing so does not discriminate against any protected class under federal nondiscrimination laws (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless households); subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project (e.g., substance use disorder treatment, domestic violence services, or a high intensity package of services designed to meet the needs of hard-to-reach homeless persons).

- *Dedicated versus Prioritized*

Projects and/or beds that are dedicated to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving households experiencing chronic homelessness must continue serving those households). This means that if two otherwise eligible households are seeking admission into the program, one who falls within

³ See DSM/Polk CoC's [Temporary Foster Care Q&A](#) for additional guidance.

the designated prioritized subpopulation and one who does not, the household who is in the designated prioritized subpopulation must be given priority for admission.

If there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, organizations should not hold the unit vacant, but instead should serve the next prioritized subpopulation who may benefit from the services being provided.

○ *Fair Housing Implications*

The Local Standards establish priority subpopulations by project type (i.e., Permanent Supportive Housing); organizations may not set more restrictive priorities. For instance, while a Permanent Supportive Housing project may prioritize households experiencing chronic homelessness with a qualifying disability per the Local Standards, beds may not be reserved for persons with a specific disability (i.e. physical disability). If an individual, who is otherwise qualified, but who does not have a physical disability, seeks admission, and would benefit from the services offered, this person may not be excluded from the project. Organizations may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

Per the federal Fair Housing Act as well as state law and local ordinances, households with children may not be categorically screened out from housing. This means that a housing project may prioritize households without children but may not limit eligibility for the project to households without children. If a household with children is otherwise eligible for a project, the household must be offered housing in the project.

VIOLENCE AGAINST WOMEN ACT (VAWA)

Organizations shall comply with the DSM/Polk CoC's [Violence against Women Act Implementation in ESG and CoC Funded Programs](#) policy which reflect HUD's regulations implementing the law. The policy includes a number of requirements:

- Notifying all program participants (current and future) of their rights under VAWA;
- Providing all participants (current and future) with a self-certification form, to have in case needed;
- Including a lease provision/addendum with all VAWA requirements in all leases with participants; and
- Establishing Rental Assistance Agreements or Contracts with all third-party housing owners, or revising current agreements or contracts, to ensure compliance with VAWA obligations.

VAWA protections mean that survivors of domestic violence, dating violence, sexual assault, or stalking:

- Cannot be denied admission to emergency housing, safe havens, transitional housing, or permanent housing programs because they are or have been victims or threatened victims;
- Cannot be evicted, lose federal rental assistance, or have emergency housing assistance terminated because they are or have been victims or threatened victims;
- Cannot be denied admission or rental assistance, evicted, terminated, or lose a rental subsidy for reasons related to the abuse, such as bad credit history and criminal history;
- May remain in housing, at least temporarily, if their abuser is evicted; and
- Must be able to move or "transfer" to another subsidized unit to protect their safety and keep their affordable housing.

HOMELESS SERVICES COORDINATION

CENTRALIZED INTAKE PARTICIPATION

Policy: The DSM/Polk CoC shall have procedures in place for evaluating individuals' and families' eligibility for ESG and CoC-fund assistance.

- All CoC and ESG-funded programs are required to participate in the DSM/Polk CoC's Centralized Intake System. Consistent with DSM/Polk CoC policies, all ESG-funded projects will rely on service, shelter, and housing placements as a result of a completed assessment and referral from the Centralized Intake staff. Participation requires following all established policies and procedures outlined in the [Centralized Intake System for Homeless Assistance Policy and Procedures](#).

Procedure: All CoC and ESG-funded programs are required to submit, as part of their application, a completed and signed Centralized Intake Verification form to affirm their project's participation within the DSM/Polk CoC's Centralized Intake System.

- The program will accept referrals exclusively from the Centralized Intake System;
- The appropriate program staff have read the Centralized Intake Policies and Procedures and understand their organization's obligations with regard to the centralized intake
- In an instance where a referral from the Centralized Intake is denied, the program will comply with the Referral Rejection section of the Centralized Intake System Policies and Procedures.
- The program will notify the Centralized Intake staff, in a timely manner, of open units.

RAPID RESOLUTION

Policy: The DSM/Polk CoC shall have procedures in place to divert households in an immediate housing crisis by accessing alternatives to entering emergency shelter or the experience of unsheltered living.

Procedure: Prior to referring household seeking emergency services, such as shelter, to Centralized Intake (CI), all CoC and ESG-funded programs must engage the household in a Rapid Resolution conversation in an attempt to resolve their immediate housing need.

- Rapid Resolution training shall be provided by the DSM/Polk CoC. Training shall be conducted by a contracted trainer or someone who has undergone the "train-the-trainer" training.
 - CoC and ESG-funded programs must ensure that relevant staff attend an initial training and be retrained every three years.
- The [Rapid Resolution Interaction form](#) shall be completed and submitted to CI following each Rapid Resolution conversation.
- Requests for financial assistance to resolve an immediate housing need should be made to CI.
 - The Rapid Resolution Interaction form must be submitted to CI before consideration will be given to requests for financial assistance.

HOMELESS MANAGEMENT INFORMATION SYSTEM

Policy: All CoC and ESG-funded programs must participate in the Homeless Management Information System (HMIS), commonly known as Wellsky Community Services (formerly ServicePoint), administered by the Institute for Community Alliances. Only programs that are specifically forbidden by other statutes or regulations (e.g. domestic violence victim service providers) may not participate.

- In the DSM/Polk CoC, victim services providers are required to use the comparable database, DVMIS.

Procedure: All CoC and ESG-funded programs shall collect and maintain common data fields as directed by the Institute for Community Alliances, considering all relevant regulations.

- The relevant program staff who are first-time HMIS users shall participate in an introductory Wellsky Community Services training.
- The relevant program staff shall also participate in subsequent trainings following data field or system changes as directed by the Institute for Community Alliances.
- Program staff shall enter data in a manner such that it meets the Homeward Board’s data completeness and quality standards.
- Program staff shall enter data in a manner such that it meets the Homeward Board’s data timeliness standards.
- Program staff not meeting either the data completeness and quality standards or the data quality standards shall participate in additional Wellsky Community Services training as needed to meet these data standards.

PARTICIPANT INCLUSION

- Each CoC-funded project is expected to engage participants in ongoing program evaluation and quality improvement processes. Toward that end, at a minimum, each project is required to survey or interview participants at least annually to obtain feedback on program service quality, the housing and service environment, and opportunities for improvement.
- Per the CoC Interim rule, all recipients and sub-recipients of CoC Program funding are required to provide for the participation of at least one homeless or formerly homeless individual on the board of directors of other equivalent policymaking entity. An advisory or tenant committee that makes recommendations to the recipient’s or subrecipient’s board, but itself does not make decisions, is not considered an equivalent policymaking entity.

ACCESS TO MAINSTREAM RESOURCES

- The DSM/Polk CoC expects every organization funded through the CoC or ESG Programs to coordinate with and access mainstream and other targeted homeless resources.
- Organizations should assess and assist participants with obtaining any mainstream resource for which they may be eligible for, including: TANF, Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Federally Qualified Health plan (Affordable Care ACT), CHIP, SSI/SSDI, Workforce Investment funds, and Welfare-to-Work.
- Where possible, organizations should streamline processes for applying for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step.
- Per the DSM/Polk CoC’s CoC Program Competition Application and the City of Des Moines ESG Competition Application, every organization funded with CoC or ESG funds is expected to have at least one SOAR trained staff person.

EDUCATION OF HOMELESS CHILDREN AND YOUTH

- All CoC- and ESG-funded projects shall follow the procedures set forth in the DSM/Polk CoC's [Education of Homeless Children and Youth](#) policy ensuring all children and unaccompanied youth are enrolled in school, or in early childhood programs, and are connected to appropriate education related services in the community.

TERMINATION AND GRIEVANCE PROCEDURES

- Organizations must have a written grievance procedure, including a formal process for participants to provide feedback.
- Organizations must have a written termination policy outlining project rules and termination processes, including a formal due process.
- Terminations may only occur in the most severe circumstances, which include, but are not limited to: consistent failure to make rental payments or adhere to a repayment schedule, consistent violation of the lease, or destruction of property.
- Termination from a project should not prohibit the household from being readmitted into the program at a future date.
- The termination process, at a minimum, must consist of:
 - Providing the participant with a written copy of the rules and the termination process before the participant begins to receive assistance;
 - Written notice to the program participant containing a clear statement of the reasons for termination: *e.g. lease obligations, tenant payments, damage to the property*;
 - A review of the decision, in which the program participant is given the opportunity to present written or oral objections/ appeal before a person other than the person (or a subordinate of that person) who made or approved the termination decision; Do we want to be specific and require a person(s) outside the agency to hear the appeal?
 - Prompt written notice of the final decision to the program participant.

POLICIES AND PROCEDURES FOR ESG AND COC-FUNDED ASSISTANCE

Unless otherwise stated, policies and procedures in this section that reference Rapid Rehousing (RRH) shall apply to the RRH portion of a Joint TH-RRH program.

EVALUATING ELGIBILITY FOR ASSISTANCE

Policy: The DSM/Polk CoC shall have procedures in place for evaluating individuals' and families' eligibility for ESG and CoC-fund assistance

Procedure: Evaluating a household's eligibility for both ESG and CoC-funded programs shall occur at the Centralized Intake.

ESG-FUNDED PROGRAMS

EMERGENCY SHELTER

- The Individual or family must be “homeless” as defined by the following categories of the Homeless Definition Final Rule:
 - Category 1: Literally Homeless
 - Category 2: Imminent Risk of Homeless
 - Category 4: Fleeing/Attempting to Flee Domestic Violence

HOMELESSNESS PREVENTION

- The Individual or family must be “homeless” as defined by the following categories of the Homeless Definition Final Rule:
 - Category 2: Imminent Risk of Homelessness
 - Category 4: Fleeing/Attempting to Flee Domestic Violence;

OR

- The individual or family must be “at-risk of homelessness” as defined by the following At-Risk of Homelessness Definition categories found in the Homeless Definition Final Rule:
 - Category 1: Individuals and Families
 - Category 2: Unaccompanied Children and Youth
 - Category 3: Families with Children and Youth

AND

- An individual or family who:
 - Has an annual income below 30% of the median family income for the Des Moines Metropolitan Statistical Area; **AND**
 - Does not have sufficient resources to prevent them from moving to an emergency shelter or another place defined in Category 1: Literally Homeless of the Homeless Definition Final Rule;

RAPID REHOUSING

- The individual or family must be “homeless” as defined by the Homeless Definition Final Rule:
 - Category 1: Literally Homeless
 - Category 4: Fleeing/Attempting to Flee Domestic Violence
- The individual or family must have annual income below 30% of Area Median Income

STREET OUTREACH

- The Individual or family must be “homeless” as defined by the following categories of the Homeless Definition Final Rule:
 - Category 1: Literally Homeless
 - Category 4: Fleeing/Attempting to Flee Domestic Violence

ANNUAL INCOME CALCULATION

- When determining the annual income of an individual or family, the subrecipient must use the standard for calculating annual income under 24 CFR 5.609.
- The determination of income eligibility shall be documented per 24 CFR 576.500(e)(1-4) and maintained in the individual’s or family’s case file

CoC FUNDED PROGRAMS

PERMANENT SUPPORTIVE HOUSING

- The Individual or family must be “homeless” as defined by the following categories of the Homeless Definition Final Rule:
 - Category 1: Literally Homeless;
 - Category 4: Fleeing/Attempting to Flee Domestic Violence
- In youth households with two adults, both adults MUST BE less than 25 years of age in order for THE ENTIRE household to be eligible for a PSH program.
- PSH is dedicated to households (single individuals, couples without children, or families with children) experiencing chronic homelessness, as defined by HUD.
 - This regulation does not pertain to PSH projects funded through the YHDP program where regulations state program participants do not have to be chronically homeless.
- PSH projects have the following additional NOFA limitations on eligibility within Category 1:
 - Individuals and Families coming from TH must have originally come from the streets, emergency shelter, or safe haven
 - Projects that are dedicated to serving households experiencing chronic homelessness, including those that were originally funded as Samaritan Bonus Initiative Projects, must continue to serve chronically homeless persons exclusively
 - Projects funded under the Permanent Supportive Housing Bonus must continue to serve the homeless population outlined in the NOFA under which the project was originally awarded.

RAPID REHOUSING

- Excluding projects funded under the DV Bonus, Joint TH-RRH and RRH for youth, individuals or families who meet the following criteria may be served by CoC-funded RRH projects
 - Category 1: Literally Homeless;
 - Receive services through a VA-funded homeless assistance program and met the criteria under “homeless”, above, at initial intake to the VA’s homeless assistance system.
- DV Bonus
 - Category 4: Fleeing/Attempting to Flee Domestic Violence
 - Receive services through a VA-funded homeless assistance program and met the criteria under “homeless”, above, at initial intake to the VA’s homeless assistance system.

TRANSITIONAL HOUSING (JOINT TH-RRH) AND RAPID REHOUSING FOR YOUTH

- Unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) must be “homeless” as defined by the following categories of the Homeless Definition Final Rule:
 - Category 1: Literally Homeless
 - Category 2: Imminent Risk of Homeless
 - Category 4: Fleeing/Attempting to Flee Domestic Violence
- Additionally, unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence are eligible to be served by a youth-serving provider.
 - In youth households with two adults, both adults MUST BE less than 25 years of age in order for THE ENTIRE household to be eligible for a PSH program.

- As provided by the Consolidated Appropriations Act, 2019, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under this NOFA.
- Youth must enroll in the program before their 25th birthday.

DOCUMENTING HOMELESSNESS

Policy: The DSM/Polk CoC shall have procedures in place for documenting individuals’ and families’ eligibility for ESG and CoC-fund assistance.

Procedure: Documenting individuals’ and families’ eligibility for ESG and CoC-fund programs will occur in the following manner:

CENTRALIZED INTAKE (CI)

- CI staff shall use the Eligibility Verification Form developed for the CoC and ESG programs which contain the criteria to document the eligibility standards for each program type met by an individual or family applying for CoC or ESG funded services as well as acceptable evidence to establish and verify the individual or family meet the applicable eligibility standards.
 - If the individual/family is determined to be ineligible for homelessness prevention services or rapid rehousing, documentation must reflect the reason for ineligibility.
- At the time they go through CI, the individual or family requesting CoC- or ESG-funded assistance must present evidence to establish and verify they meet the applicable eligibility standards described in the Eligibility Verification Form developed for the CoC and ESG program for which they are applying for assistance.
 - The determination of homeless or at-risk of homeless status shall always be documented in writing and maintained in the individual’s or family’s case file.
 - The order of preference for documenting an individual’s or family’s homeless or at-risk of homeless status shall be:
 - i. Third-party documentation, including written & source documentation or HMIS records
 - ii. Intake work observations
 - iii. Certification from the person seeking assistance
- Utilizing other forms of already available documentation shall also be acceptable evidence of an individual or family’s homeless status. Already available documentation shall include certification or other appropriate service transactions recorded in Wellsky Community Services as well as discharge paperwork to verify a stay in an institution of 90 days or less.
 - When using information from the Wellsky Community Services system (HMIS) as evidence of homelessness, dated printouts from the system documenting this type of verification was done prior to the participant’s entry into a program must be included in the participant’s case file.
- Where third-party documentation is not obtainable, a written record of the case manager’s due diligence in attempting to obtain the evidence and certification by the head(s) of household seeking assistance shall be maintained in the family’s case file.
- Where required, the determination of income eligibility shall be documented (see interim rule on documenting income) and maintained in the individual’s or family’s case file.

- Upon documenting eligibility, a Homeless Verification letter, documenting the name(s) of the individual(s) or family members and the category of homelessness status, shall be uploaded into the individual’s or family’s Wellsky Community Services record.

ESG-FUNDED PROGRAMS

Emergency Shelter & Rapid Rehousing

- Download the Homeless Verification letter from the individual’s or family’s Wellsky Community Services record.
- Complete the Eligibility Verification Form indicating the criterion that defines the individual’s or family’s homeless status based on the Homeless Verification letter provided by the centralized intake.
- The Homeless Verification letter shall be attached to the Eligibility Verification Form and placed in the client’s folder.

Outreach

- Organizations must document the individuals’ or families’ eligibility at intake using the following standards:
 - **For clients experiencing unsheltered homelessness** (Category 1/Literal Homelessness, sub-category (1)(i)), a completed homeless verification should be completed by the Street Outreach program in HMIS when a client is referred to the project.
 - Preferred Order for Literally Homeless Documentation (Category 1):
 - Third Party Certification Written (including already available documents such as HMIS record) or Oral (case manager to write out oral statement, sign, and date),
 - When using information from the Wellsky Community Services system (HMIS) as evidence of homelessness, dated printouts from the system documenting this type of verification was done prior to the participant’s entry into a program must be included in the participant’s case file.
 - OR
 - Staff Observations (must be written, signed, and dated by relevant staff), OR
 - Self-Certification (must be written and dated).
 - While third party certification is the preferred method of verification for ESG, **lack of third-party certification MUST NOT be a barrier to street outreach services**. Staff observations are acceptable and often the most feasible for street outreach projects and can be satisfied by entering the client’s location in HMIS via the Current Living Situation data element.
 - **For clients fleeing domestic violence (“Category 4”) and entering the SO project**, clients are still only eligible if they are unsheltered. The preferred documentation order differs to consider Category 4 client safety and emergency needs.
 - Preferred Order for Literally Homeless Documentation (Category 1):
 - Victim-Service Provider Intake:
 - An oral statement by the individual or head of household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

- Non-Victim Service Provider Intake:
 - Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. **Where the safety of the individual or family is not jeopardized, the oral statement must be verified;** AND
 - Certification by the individual or head of household that no subsequent residence has been identified; AND
 - Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Homelessness Prevention

Organizations must document the individuals' or families' eligibility at intake and at re-evaluation using the following standards:

- An Eligibility Verification Form shall be completed at intake indicating the criterion that defines the individual's or family's homeless status as well as the type(s) of evidence relied upon to establish and verify the individuals' or family's homeless status.
- The individual or family requesting homelessness prevention assistance must present evidence to establish and verify they meet the applicable eligibility standards.
 - i. The determination of homeless or at-risk of homeless status shall always be documented in writing and maintained in the individual's or family's case file. The order of preference for documenting an individual's or family's homeless or at-risk of homeless status shall be:
 - Third-party documentation
 - Intake work observations
 - Certification from the person seeking assistance
 - ii. Utilizing other forms of already available documentation shall also be acceptable evidence of an individual or family's homeless status. Already available documentation shall include:
 - Certification or other appropriate service transactions recorded in Wellsky Community Services
 - When using information from the Wellsky Community Services system (HMIS) as evidence of homelessness, dated printouts from the system documenting this type of verification was done prior to the participant's entry into a program must be included in the participant's case file.
 - Discharge paperwork to verify a stay in an institution of 90 days or less.
 - iii. Every attempt shall be made to obtain third-party documentation of homeless/at-risk of homeless status. In lieu of third-party documentation, a written record of due diligence shall be noted in the corresponding section of the Eligibility Verification form that includes the date(s) documentation was sought, the type(s) of documentation sought, the source(s) from whom the documentation was sought, and a description of the response received from each attempt to obtain the documentation.
 - iv. All documents used to establish and verify an individual's or family's homeless/at-risk of homeless status shall be attached to the Eligibility Verification Form and placed in the individual's or family's case file.

- o For clients fleeing domestic violence (“Category 4”) and seeking assistance from a HP project, the preferred documentation order differs to consider Category 4 client safety and emergency needs.
 - Victim-Service Provider Intake:
 - An oral statement by the individual or head of household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.
 - Non-Victim Service Provider Intake:
 - Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. **Where the safety of the individual or family is not jeopardized, the oral statement must be verified;** AND
 - Certification by the individual or head of household that no subsequent residence has been identified; AND
 - Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

CoC-FUNDED PROGRAMS

- Document eligibility according to [HUD recordkeeping requirements at 24 CFR 578.103](#) for the CoC Program.

PRIORITIZATION FOR ASSISTANCE

Policy: The DSM/Polk CoC shall have procedures in place for determining and prioritizing which eligible individuals and families will receive ESG and CoC-fund assistance.

Procedure: Determining which eligible individuals and families will receive assistance from ESG and CoC-funded programs shall occur in the following manner:

ESG-FUNDED PROGRAMS

Emergency Shelter & Rapid Rehousing

- Prioritization will occur at the Centralized Intake and be consistent with the policies and procedures outlined in the DSM/Polk CoC’s [Centralized Intake System for Homeless Assistance Policies and Procedures](#).

Homelessness Prevention

Prioritization will occur at the Centralized Intake and be consistent with the policies and procedures outlined in the DSM/Polk CoC’s [Centralized Intake System for Homeless Assistance Policies and Procedures](#).

- Any household that may otherwise be eligible for prevention assistance under ESG must also meet the “but for” rule – that is, “Would this individual or family be homeless but for this assistance?”
- The “but for” rule can be documented with the following:
 - o Certification by the individual or head of household that no subsequent residence has been identified;
AND

- Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
- Furthermore, any household that qualifies for prevention assistance and meets the “but for” rule must also have the following qualifications:
 - Have no more than three months of arrears; and
 - Demonstrated an ability to sustain housing; and
 - Demonstrate an ability to earn income; and
 - Would remain in housing that is decent, safe, sanitary, and affordable.
- If the household cannot meet the above qualifications, it is reasonable to infer that the household is in greater need than prevention assistance can provide for, and the household will be referred to a more appropriate program.

CoC-FUNDED PROGRAMS

- Prioritization will occur at the Centralized Intake and be consistent with the policies and procedures outlined in the [Centralized Intake System for Homeless Assistance Policies and Procedures](#).

DETERMINING PROGRAM LENGTH AND TIME PERIOD FOR RENTAL ASSISTANCE

Policy: The DSM/Polk CoC shall have procedures in place for determining the program length of each ESG/CoC-funded program component and how long a particular program participant will be provided rental assistance.

Procedure: Program length and the length of time a particular program participant will be provided rental assistance will be as follows:

ESG-FUNDED PROGRAMS

EMERGENCY SHELTER

- Each ESG-funded emergency shelter shall develop policies and procedures for:
 - The number of days families or individuals served by the program may remain in shelter as well as any grounds for extending shelter stay;
 - Discharge from emergency shelter
 - Assessing, prioritizing, and reassessing an individuals’ or families’ needs for essential services related to emergency shelter.

HOMELESSNESS PREVENTION

- The DSM/Polk CoC requires the program length for homelessness prevention to be:
 - At a minimum, one month and no more than 24 months.
- The minimum standards for determining how long a participant shall be provided with rental assistance are as follows:
 - Participants shall receive approval for the minimum amount of financial assistance necessary to prevent their homelessness based on their unique circumstances.
 - Approval for rental assistance shall be granted in no more than three-month increments for ongoing payments.
 - Participants shall not be approved for more rental assistance than can be justified given their current income and expenses.

- Financial need must be documented in the participant’s file each time their assistance is evaluated.
 - Homelessness prevention assistance shall not be provided to an individual or family for more than 24 of the months in any 36-month period.
- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
 - Each month of rent paid in arrears counts as one month of rental assistance for the purposes of calculating a participant’s total rental assistance received.
- The process used to transition the household off financial assistance must be coordinated with case management efforts that help the household assume and sustainably cope with their housing costs unless a client chooses otherwise.

RAPID REHOUSING

- The DSM/Polk CoC requires the program length for ESG- funded RRH to be:
 - Not less than six months and no more than 24 months.
- The minimum standards for determining how long a participant shall be provided with rental assistance are as follows:
 - Participants shall receive approval for the minimum amount of financial assistance necessary to end their homelessness based on their unique circumstances.
 - Approval for rental assistance shall be granted in no more than three-month increments for ongoing payments.
 - Participants shall not be approved for more rental assistance than can be justified given their current income and expenses.
 - Financial need must be documented in the participant’s file each time their assistance is evaluated.
 - RRH assistance shall not be provided to an individual or family for more than 24 months in any 36-month period.
- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
 - Each month of rent paid in arrears counts as one month of rental assistance for the purposes of calculating a participant’s total rental assistance received.
- The process used to transition the household off financial assistance must be coordinated with case management efforts that help the household assume and sustainably cope with their housing costs.

CoC-FUNDED PROGRAMS

RAPID REHOUSING

- The DSM/Polk CoC requires the program length for RRH to be:
 - No less than six months and no more than 24 months for CoC-funded RRH.
- The minimum standards for determining how long a participant shall be provided with rental assistance are as follows:
 - Participants shall receive approval for the minimum amount of financial assistance necessary to end their homelessness based on their unique circumstances.
 - Approval for rental assistance shall be granted in no more than three-month increments.
 - Participants shall not be approved for more rental assistance than can be justified given their current income and expenses.
 - Financial need must be documented in the participant’s file each time their assistance is evaluated.

- Generally, RRH assistance shall not be provided to an individual or family for more than 24 of the months in any 36-month period.
- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
 - Each month of rent paid in arrears counts as one month of rental assistance for the purposes of calculating a participant's total rental assistance received.
- The process used to transition the household off financial assistance must be coordinated with case management efforts that help the household assume and sustainably cope with their housing costs.

JOINT TH-RRH

- The agency administering the program must provide both units supported by the transitional housing component and the tenant-based rental assistance as well as services provided through the PH-RRH component to all program participants.
 - A program participant, however, may choose to receive only the transitional housing unit, or the assistance provided through the PH-RRH component.
- Maximum program length for the TH component cannot exceed 24 months.
 - The primary objective of transitional housing is to move a household from homelessness to permanent housing as quickly as possible; assistance in transitioning to permanent housing must be made available/provided as quickly as possible from transitional housing program entry.
- Maximum program length for the RRH component cannot exceed 24 months.
- Program participants may only receive up to 24 months of TOTAL TH-RRH assistance.
- The minimum standards for determining how long a participant shall be provided with rental are as follows:
 - Participants shall receive approval for the minimum amount of financial assistance necessary to end their homelessness based on their unique circumstances.
 - Approval for rental assistance shall be granted in no more than three-month increments.
 - Participants shall not be approved for more rental assistance than can be justified given their current income and expenses.
 - Financial need must be documented in the participant's file each time their assistance is evaluated.

PERMANENT SUPPORTIVE HOUSING

- There can be no predetermined length of stay for a PSH project.
- Program recipients shall receive rental assistance as long as they remain in the PSH project.
- After at least three years in the PSH project, program recipients shall be assessed, per DSM/Polk CoC's [Move-On Policy](#), as to their ability to move from PSH to another housing assistance program.
 - Moving to another housing assistance program is purely voluntary. A PSH program participant **cannot be forced** to move to another housing assistance program.

DETERMINING PARTICIPANTS CONTRIBUTION TOWARD RENT AND UTILITY COSTS

Policy: The DSM/Polk CoC shall have procedures in place for determining a participant's contribution toward rent and utility costs

Procedure: The amount of a participant's contribution toward rent and utility costs will be as follows:

A participant's total contribution toward rent and utilities must be universally and consistently applied to all participants served in CoC- and ESG-funded RRH programs.

ESG-FUNDED PROGRAMS

EMERGENCY SHELTER

- ESG-funded emergency shelters may not charge participants any program fees.

HOMELESSNESS PREVENTION

Rent

- For purposes of calculating rent, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the Des Moines Metropolitan Housing Agency for the area in which the housing is located.
 - The monthly allowance for utilities should be made payable to the utility company charging for the service.
- A household's monthly subsidy amount should be based on the household's size, composition, and income; reasonable in relation to rents being charged for comparable units.
 - Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants.

Utilities

- ESG-funded programs may pay:
 - Utility deposits
 - ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities
 - Eligible utility services are gas, electric, water, and sewage.
 - Utility payments
 - Eligible utility services are gas, electric, water, and sewage.
 - May pay for up to 24 months of utility payments per program participant, per service
 - Includes up to 6 months of utility payments in arrears, per service
 - A partial payment of a utility bill counts as one month.
 - This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
 - No program participant shall receive more than 24 months of utility assistance within any 3-year period.
 - When paying for utilities alone, the subrecipient pays the actual cost of the utilities instead of the monthly allowance for utilities established by the Des Moines Metropolitan Housing Agency.
 - Utility deposits and payments should be made payable to the utility company charging for the service.

Verification and Re-evaluation

- The income of program participants, in ESG-funded programs, must be calculated in accordance with 24 CFR 5.609.

- Documentation of the participant’s income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the participant’s project file. This file shall also contain the participant’s plan to remain housed when their assistance comes to an end, by increasing income, decreasing expenses, or both.
- A program participant’s eligibility for homelessness prevention assistance and the types and amounts of assistance the program participant needs will be evaluated not less than once every 3 months. At a minimum, the reevaluation must establish that:
 - The program participant does not have an annual income that exceeds 30% of AMI for the household size; and
 - The program participant lacks sufficient resources and support necessary to retain housing without RRH assistance.
 - Each homelessness prevention project must establish policies concerning notification of changes in participants’ income or family composition.

RAPID REHOUSING

Rent

- Participants are not required to contribute rent.
- A household’s monthly subsidy amount should be based on the household’s size, composition, and income; reasonable in relation to rents being charged for comparable units.
 - Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider’s policies and clearly communicated to program participants.
- Rental assistance should be provided in a flexible and progressive manner that is tailored to the household’s needs. To the extent possible, programs shall decrease the subsidy as the household’s length of time in the RRH program increases.
 - During the first three months of program enrollment, the participant shall contribute \$0.00 toward rent.
 - During the last 3 months of program enrollment, the participant shall contribute a minimum of 50% of their rent.
 - Programs are expected to provide hardship exemptions from any rental charges if such charges could lead to loss of housing for the assisted household.
- In such cases, the housing stability case manager and program participant will determine the additional amount of rental assistance needed based on the program participant’s current income and expenses.
 - For purposes of calculating rent, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the Des Moines Metropolitan Housing Agency for the area in which the housing is located.
 - The monthly allowance for utilities should be made payable to the utility company charging for the service.

Utilities

- ESG-funded programs may pay:
 - Utility deposits
 - ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities

- Eligible utility services are gas, electric, water, and sewage.
- Utility payments
 - Eligible utility services are gas, electric, water, and sewage.
 - May pay for up to 24 months of utility payments per program participant, per service
 - Includes up to 6 months of utility payments in arrears, per service
 - A partial payment of a utility bill counts as one month.
 - This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
 - No program participant shall receive more than 24 months of utility assistance within any 3-year period.
- Utility deposits and payments should be made payable to the utility company charging for the service.

Verification and Re-evaluation

- A household’s monthly subsidy amount should be based on the household’s size, composition, and income; reasonable in relation to rents being charged for comparable units.
- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider’s policies and clearly communicated to program participants.
 - Documentation of the participant’s income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the participant’s project file. This file shall also contain the participant’s plan to remain housed when their assistance comes to an end, by increasing income, decreasing expenses, or both.
 - The income of program participants, in ESG-funded programs, must be calculated in accordance with 24 CFR 5.609.
 - A program participant’s eligibility for RRH assistance will be evaluated not less than once annually. At a minimum, the reevaluation must establish that
 - The program participant does not have an annual income that exceeds 30% of AMI for the household size; and
 - The program participant lacks sufficient resources and support necessary to retain housing without RRH assistance.
 - Each RRH project must establish policies concerning notification of changes in participants’ income or family composition.

CoC-FUNDED PROGRAMS

RAPID REHOUSING

Rent

- Participants are not required to contribute rent.
- Rental assistance should be provided in a flexible and progressive manner that is tailored to the household’s needs. To the extent possible, programs shall decrease the subsidy as the household’s length of time in the RRH program increases.
 - During the first three months of program enrollment, the participant shall contribute \$0.00 toward rent.

- During the last 3 months of program enrollment, the participant shall pay a minimum of 50% of their rent.
- Programs are expected to provide hardship exemptions from any rental charges if such charges could lead to loss of housing for the assisted household.
 - In such cases, the housing stability case manager and program participant will determine the additional amount of rental assistance needed based on the program participant's current income and expenses.
- The rent shall equal the sum of the total monthly rent for the unit any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the Des Moines Metropolitan Housing Agency.
 - Utilities include gas, oil, electric, sewage, water, and trash removal.
 - RRH projects must follow the guidance found in [HUD CPD Notice 17-11](#) when calculating total monthly rent, applicable utility allowance and any utility reimbursement owed to the participant.

Utilities

- CoC-funded programs may pay:
 - Utility deposits
 - A one-time fee paid to a utility company.
 - CoC funds **may not** be used to pay monthly utilities unless they are included in the rental amount, or a utility reimbursement is provided.

Limitations, Verification and Re-evaluation

- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay as well as how a program participant will be assisted in paying utilities, if needed, shall be determined by the individual service provider's policies, and clearly communicated to program participants.
- Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the participant's project file. This file shall also contain the participant's plan to remain housed when their assistance comes to an end, by increasing income, decreasing expenses, or both.
- The income of program participants, in CoC- and ESG-funded programs, must be calculated in accordance with [24 CFR 5.609](#).
- A program participant's eligibility for RRH assistance will be evaluated not less than once annually.
 - At a minimum, the reevaluation must establish that
 - The program participant lacks sufficient resources and support necessary to retain housing without RRH assistance, and
 - The types and amounts of assistance the program participant needs to retain housing.
- Each RRH project must establish policies concerning notification of changes in participants' income or family composition.

PERMANENT SUPPORTIVE HOUSING

- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the Des Moines Municipal Housing Agency.

- The rent charged for the unit receiving rental assistance must be reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged by the same owner for comparable unit. The income of program participants, in CoC-funded programs, must be calculated in accordance with [24 CFR 5.609](#) and [24 CFR 5.611\(a\)](#).
- The participant's income shall be verified initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the participant's project file.

RENTAL PAYMENTS

Policy: The DSM/Polk CoC shall have procedures in place for determining when rental assistance will be paid.

Procedure: Minimum standards for determining when rental assistance will be paid:

ESG-FUNDED PROGRAMS

RENTAL PAYMENTS

Homelessness Prevention

- Payments for rental assistance shall comply with applicable HUD standards.
 - In homelessness prevention projects, rental assistance may cover up to the FMR for a unit and units must comply with HUD's rent reasonableness standards.
 - RRH project staff must follow the Rent Reasonableness Determination procedure, outlined in the next section, to determine and document rent reasonableness
- Payments for rental assistance shall be made only when:
 - There is a legally binding, written lease between the unit's owner and the participant.
 - For participants receiving project-based rental assistance (PBRA) under the ESG Program, the lease must have an initial term of 1 year.
 - There is no minimum lease period for tenant-based rental assistance (TBRA) under ESG.
 - The lease shows the names of the tenants, the move-in-date, occupancy terms, expiration date and the costs payable by the tenant.
 - This requirement for a lease does not apply to payments made for rent arrears.
 - There is a rental assistance agreement between the homelessness prevention provider and the unit's owner, which sets forth the terms under which rental assistance will be provided. The rental assistance agreement must include:
 - A requirement that the owner provide the grantee with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and
 - The same payment due date, grace period, and late-payment penalty requirements are in the participant's lease.
 - A prohibition against the denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking, per 24 CFR part 5, subpart L, as supplemented by § 576.409, except for the emergency transfer plan requirements under 24 CFR 5.2005(e) and 576.409(d).

- Payments shall be made only for units that have been inspected for HUD Habitability Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet these standards.
- The subrecipient must make timely payments to each owner in accordance with the rental assistance agreement.
 - The subrecipient is solely responsible for paying late payment penalties that occur using non-ESG funds.
- Lead-based paint requirements must be evaluated for any chipped, cracking, or peeling paint. All tenants with children under the age of 6 who are in housing built prior to 1979 are required to be given a lead-based paint pamphlet and to certify that they received the pamphlet. A copy of this certification must be placed in the participant's file.

Limitations on Tenant-Based Rental Assistance

When TBRA is provided, the rental assistance agreement with the unit owner shall be terminated without further payments if

- The participant moves out of the unit, or
- The lease terminates and is not renewed.

Rapid Rehousing

- Payments for rental assistance shall comply with applicable HUD standards.
 - In ESG-funded RRH projects, rental assistance may cover up to the FMR for a unit and units must comply with HUD's rent reasonableness standards.
 - RRH project staff must follow the Rent Reasonableness Determination procedure, outlined in the next section, to determine and document rent reasonableness
- Payments for rental assistance shall be made only when:
 - There is a legally binding, written lease between the unit's owner and the participant.
 - For participants receiving project-based rental assistance (PBRA) under the ESG Program, the lease must have an initial term of 1 year.
 - There is no minimum lease period for tenant-based rental assistance (TBRA) under ESG.
 - This requirement for a lease does not apply to payments made for rent.
 - There is a rental assistance agreement between the RRH provider and the unit's owner, which sets forth the terms under which rental assistance will be provided, including the requirements specified above. The rental assistance agreement must include:
 - A requirement that the owner provide the grantee with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and
 - The same payment due date, grace period, and late-payment penalty requirements are in the participant's lease.
 - A prohibition against the denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking, per 24 CFR part 5, subpart L, as supplemented by § 576.409, except for the emergency transfer plan requirements under 24 CFR 5.2005(e) and 576.409(d).
- Payments shall be made only for units that have been inspected for HUD Habitability Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet these standards.

- The subrecipient must make timely payments to each owner in accordance with the rental assistance agreement.
 - The subrecipient is solely responsible for paying late payment penalties that occur with non-ESG funds.
- Lead-based paint requirements must be evaluated for any chipped, cracking, or peeling paint. All tenants with children under the age of 6 who are in housing built prior to 1979 are required to be given a lead-based paint pamphlet and to certify that they received the pamphlet. A copy of this certification must be placed in the participant's file.

Limitations on Tenant-Based Rental Assistance

When TBRA is provided, the rental assistance agreement with the unit owner shall be terminated without further payments if

- The participant moves out of the unit, or
- The lease terminates and is not renewed.

CoC-FUNDED PROGRAMS

RENTAL PAYMENTS

Rapid Rehousing

- Payments for rental assistance shall comply with applicable HUD standards.
 - For CoC-funded RRH, rent reasonableness is the applicable rent.
 - HUD will only provide rental assistance for a unit if the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units.
 - Reasonable rent must not exceed rents currently being charged by the same owner for comparable.
 - RRH project staff must follow the Rent Reasonableness Determination procedure, outlined in the next section, to determine and document rent reasonableness.
- Payments for rental assistance shall be made only when:
 - There is a legally binding, written lease between the unit's owner and the participant.
 - The lease must be for an initial term of no less than 1 year, which terminates for cause; and
 - The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice from either party.
- Payments shall be made only when for units that have been inspected for HUD Housing Quality Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet these standards.
- Lead-based paint requirements must be evaluated for any chipped, cracking, or peeling paint. All tenants with children under the age of 6 who are in housing built prior to 1979 are required to be given a lead-based paint pamphlet and to certify that they received the pamphlet. A copy of this certification must be placed in the participant's file.
- If an assisted unit is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person.
 - No additional assistance will be paid until the unit is occupied by another eligible person.
 - Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.

Permanent Supportive Housing

- Payments for rental assistance shall comply with applicable HUD standards.

- For CoC-funded PSH, rent reasonableness is the applicable rent standard and units in a structure must comply with HUD’s rent reasonableness standard.
 - PSH project staff must follow the Rent Reasonableness Determination procedure, outlined in the next section, to determine and document rent reasonableness
- Payments shall be made only under the following conditions for Sponsor-Based Rental Assistance:
 - Sponsor-based rental assistance is provided through contracts between the recipient and sponsor organization, a lease between the sponsor and the landlord and a sublease between the sponsor and the program participant.
 - A sponsor may be a private, nonprofit organization, or a community mental health agency established as a public nonprofit organization.
 - Program participants must reside in housing owned or leased by the sponsor.
- Payments shall be made only for units that have been inspected for HUD Housing Quality Standards (CoC-funded RRH) and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet these standards.
- Lead-based paint requirements must be evaluated for any chipped, cracking, or peeling paint. All tenants with children under the age of 6 who are in housing built prior to 1979 are required to be given a lead-based paint pamphlet and to certify that they received the pamphlet. A copy of this certification must be placed in the participant’s file.

RENT REASONABLENESS

Policy: Homelessness Prevention, RRH, and PSH projects shall have procedures in place for rent reasonableness determination that comply with the regulations governing the funding source being used to pay rental assistance.

“Rent reasonableness” is defined as a rental amount that does not exceed the rent charged for comparable, unassisted units in the same market area. Also, owners may not charge more for assisted units than for comparable units on the premises.

ESG-FUNDED PROGRAMS

[§ 576.106\(d\)\(1\)](#)

Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under [24 CFR part 888](#), and complies with HUD's standard of rent reasonableness, as established under [24 CFR 982.507](#).

[§ 982.507\(b\)\(1-2\)](#)

Comparability. The PHA must determine whether the rent to owner is a reasonable rent in comparison to rent for other comparable unassisted units. To make this determination, the PHA must consider:

- (1) The location, quality, size, unit type, and age of the contract unit; and
- (2) Any amenities, housing services, maintenance, and utilities to be provided by the owner in accordance with the lease.

CoC-FUNDED PROGRAMS

[§ 578.51\(g\)](#)

The subrecipient must determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units.

Units that Must Not be Used as Comparables

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that impose rent restrictions cannot be considered comparable units.

Procedure: Following enrollment in the rapid rehousing program, the Rent Reasonableness Determination worksheet, found in this section, must be completed to determine and document rent reasonableness, and in the case of ESG-funded projects, to document that the rental assistance doesn't exceed FMR for the unit size. These steps must be completed prior to the signing of the lease.

A. Completion of Rent Reasonableness Determination Form

1. The responsibility for completing the Rent Reasonableness Determination Form may be assigned to one or more program staff. The designated staff person should be identified in the subrecipient's rent reasonableness determination policy.
2. Complete the Participant Information section of the form listing the program participant's name and HMIS number; the project type – Rapid Rehousing (RRH) or Permanent Supportive Housing (PSH) – and the reason for the rent reasonableness determination.
3. Using Rentometer or a similar tool, complete the Comparable Properties Worksheet.
 - a. Information should be recorded for each of the factors listed on the worksheet for the unit for which rental assistance is sought (Proposed Unit) and three comparable units (Unit #1, Unit #2, Unit #3), and one unit from the same apartment complex as the proposed unit (Landlord Unit).
 - i. If you cannot find a comparable unit in the area where the Proposed Unit is located, look for a comparable unit in a similar area.
 - ii. If a comparable Landlord Unit cannot be located, this should be noted under Additional Comments found in the Certification section of the Rent Reasonableness Determination form.

- b. Explanation of Factors to Consider

Address – The street address, city, state and zip code

Size – The number of bedrooms and square footage of the unit

Type of Unit – Multi-family: apartment; Single family: home or mobile home; Semi-detached: duplex, townhouse or row house

Quality – Multi-family type: The physical condition of the apartment unit; Single family and Semi-detached: the physical condition of the interior and exterior of the building

Location– The area in which the unit is located. Is the unit accessible to public transportation/bus? Proximity to grocery store, parks, schools, childcare, libraries, businesses/ shopping, hospitals, community service agencies.

Management – Availability of on-site management staff or desk service

Maintenance – Availability of on-site maintenance or janitorial staff

Amenities – Unit amenities: air conditioning, dishwasher, ceiling fans, microwave, garbage disposal, washer/dryer, intercom/ security system.

Facility - exercise room, community room, computer room, on-site services, laundry facility, parking, garage storage unit, pool, playground, secured building

Housing Services – Live-in manager, Security personnel, Social services/medical personnel

Age – How old is the unit, in years?

Utilities – Utilities that the tenant will pay and are eligible to be paid with project funds. Eligible utilities: Gas for heating, cooking and/or water heater; electric for heating or cooking; air conditioning; water; sewer and trash removal

Unit Rent – The amount of rent being charged by the landlord for the unit.

Utility Allowance – The use of a “utility allowance” is required to calculate the estimated cost of tenant-paid utilities. The designated staff person completing the Rent Reasonableness Determination form shall calculate the utility allowance for those utilities that would be paid for by the tenant using Des Moines Municipal Housing Agency’s Utility Allowance Schedule for the type and size of the units being compared.

Gross Rent – The unit rent plus utility allowance

Handicap Accessible – The unit, and building in which the unit is located, can be approached, entered and used by individuals with physical handicaps.

- c. If Rentometer, or a similar tool, does not include information on all the factors listed in the Comparable Properties Worksheet, additional data sources should be utilized. The following are potential sources of information to identify housing and comparable units:

- i. The Polk County Assessor page at web.assess.co.polk.ia.us
- ii. Newspaper ads (including internet versions)
- iii. Weekly or monthly neighborhood or “shopper” newspapers with rental listings
- iv. “For Rent” signs in windows or on lawns
- v. Bulletin Boards in community locations (i.e., grocery stores, laundry mats, social services offices)
- vi. Real estate agents
- vii. Property management companies that handle rental property
- viii. Rental listing websites such as:

<https://www.apartmentguide.com/>

<https://www.apartments.com/>

<https://www.zillow.com/>

<https://www.realtor.com/>

4. Establishing Comparability

Comparability is established when the factors listed on the Comparable Properties Worksheet are similar for the Proposed Unit, three comparable units (Unit #1, Unit #2, Unit #3), and the Landlord Unit.

5. Certification of Rent Reasonableness

a. Gross rent for the unassisted Proposed Unit

- i. Once comparability is established, the designated staff person completing the Rent Reasonableness Determination form will compare the gross rent of the Proposed Unit to that of the three Comparable Units to ensure it does not exceed the rents of the comparable unassisted units.
- ii. The designated staff person will check either “Yes” or “No” to certify whether the Proposed Unit’s rent is “reasonable in comparison” to similar properties.
- iii. If the unit selected for the participant is NOT reasonable in comparison to the properties listed, the designated staff person must include a justification as to why this property was selected (i.e., need to be on bus route, handicap accessibility, etc.).

b. Rent for the unassisted unit by the same property owner (i.e., Landlord Unit)

- i. Once comparability is established, the designated staff person completing the Rent Reasonableness Determination form will compare the gross rent of the Proposed Unit to that of Landlord Unit to ensure it does not exceed the rent of the Landlord Unit.
- ii. The designated staff person will check either “Yes” or “No” to certify whether the Proposed Unit’s rent is comparable to the Landlord Unit.
- iii. If the unit selected for the participant is NOT reasonable in comparison Landlord Unit, the designated staff person must include a justification as to why this property was selected (i.e., need to be on bus route, handicap accessibility, etc.).

B. Fair Market Rent Test (ESG-funded RRH Projects ONLY)

1. Following the rent reasonableness determination, the designated staff person must certify the gross rent for the Proposed Unit does not exceed the Fair Market Rent (FMR) for the size of the proposed unit.

- a. Indicate the size of the unit (i.e., 1 bedroom, 2 bedroom, etc.)
- b. Indicate the FMR for the size of the unit
 - i. FMRs can be found at <https://www.huduser.gov/portal/datasets/fmr.html>
- c. Check either “Yes” or “No” to certify the gross rent of the Proposed Unit is equal to or less than Fair Market Rent for the unit size.

C. Documentation

A copy of the following documents shall be maintained in the program participant’s file:

- a. Rent Reasonableness Determination form
- b. Utility Allowance Schedule for each unit listed on the Rent Reasonableness Determination form

RENT REASONABLENESS DETERMINATION

Participant Information					
Name:	HMIS Number:				
Project Type:	Enrollment Date:				
Reason for Rent Reasonableness Determination:					
<input type="checkbox"/> Participant is pursuing first housing placement during project participation <input type="checkbox"/> Continuing participant has concluded first lease and is pursuing continued placement in this unit <input type="checkbox"/> Continuing participant is pursuing transition to this unit <input type="checkbox"/> Placed, continuing participant's rent has changed <input type="checkbox"/> Annual Review					
Comparable Properties Worksheet					
	Proposed Unit	Unit #1	Unit #2	Unit #3	Landlord unit
Address					
Size: Number of bedrooms					
Size: Square Feet					
Type of Unit/ Construction	<input type="checkbox"/> Single Family <input type="checkbox"/> Multi-Family <input type="checkbox"/> Semi-Detached	<input type="checkbox"/> Single Family <input type="checkbox"/> Multi-Family <input type="checkbox"/> Semi-Detached	<input type="checkbox"/> Single Family <input type="checkbox"/> Multi-Family <input type="checkbox"/> Semi-Detached	<input type="checkbox"/> Single Family <input type="checkbox"/> Multi-Family <input type="checkbox"/> Semi-Detached	<input type="checkbox"/> Single Family <input type="checkbox"/> Multi-Family <input type="checkbox"/> Semi-Detached
Quality: Unit Condition					
Quality: Building Condition					
Location					
Management	Management staff <input type="checkbox"/> yes <input type="checkbox"/> no Desk Service <input type="checkbox"/> yes <input type="checkbox"/> no	Management staff <input type="checkbox"/> yes <input type="checkbox"/> no Desk Service <input type="checkbox"/> yes <input type="checkbox"/> no	Management staff <input type="checkbox"/> yes <input type="checkbox"/> no Desk Service <input type="checkbox"/> yes <input type="checkbox"/> no	Management staff <input type="checkbox"/> yes <input type="checkbox"/> no Desk Service <input type="checkbox"/> yes <input type="checkbox"/> no	Management staff <input type="checkbox"/> yes <input type="checkbox"/> no Desk Service <input type="checkbox"/> yes <input type="checkbox"/> no
Maintenance	Maintenance Staff <input type="checkbox"/> yes <input type="checkbox"/> no Janitorial <input type="checkbox"/> yes <input type="checkbox"/> no	Maintenance Staff <input type="checkbox"/> yes <input type="checkbox"/> no Janitorial <input type="checkbox"/> yes <input type="checkbox"/> no	Maintenance Staff <input type="checkbox"/> yes <input type="checkbox"/> no Janitorial <input type="checkbox"/> yes <input type="checkbox"/> no	Maintenance Staff <input type="checkbox"/> yes <input type="checkbox"/> no Janitorial <input type="checkbox"/> yes <input type="checkbox"/> no	Maintenance Staff <input type="checkbox"/> yes <input type="checkbox"/> no Janitorial <input type="checkbox"/> yes <input type="checkbox"/> no

Amenities:	Unit: <input type="checkbox"/> air conditioning <input type="checkbox"/> dishwasher <input type="checkbox"/> ceiling fans <input type="checkbox"/> microwave <input type="checkbox"/> washer/dryer <input type="checkbox"/> intercom/ security system	Unit: <input type="checkbox"/> air conditioning <input type="checkbox"/> dishwasher <input type="checkbox"/> ceiling fans <input type="checkbox"/> microwave <input type="checkbox"/> washer/dryer <input type="checkbox"/> intercom/ security system	Unit: <input type="checkbox"/> air conditioning <input type="checkbox"/> dishwasher <input type="checkbox"/> ceiling fans <input type="checkbox"/> microwave <input type="checkbox"/> washer/dryer <input type="checkbox"/> intercom/ security system	Unit: <input type="checkbox"/> air conditioning <input type="checkbox"/> dishwasher <input type="checkbox"/> ceiling fans <input type="checkbox"/> microwave <input type="checkbox"/> washer/dryer <input type="checkbox"/> intercom/ security system	Unit: <input type="checkbox"/> air conditioning <input type="checkbox"/> dishwasher <input type="checkbox"/> ceiling fans <input type="checkbox"/> microwave <input type="checkbox"/> washer/dryer <input type="checkbox"/> intercom/ security system
Facility	<input type="checkbox"/> exercise room <input type="checkbox"/> community room <input type="checkbox"/> computer room <input type="checkbox"/> on-site services	<input type="checkbox"/> exercise room <input type="checkbox"/> community room <input type="checkbox"/> computer room <input type="checkbox"/> on-site services	<input type="checkbox"/> exercise room <input type="checkbox"/> community room <input type="checkbox"/> computer room <input type="checkbox"/> on-site services	<input type="checkbox"/> exercise room <input type="checkbox"/> community room <input type="checkbox"/> computer room <input type="checkbox"/> on-site services	<input type="checkbox"/> exercise room <input type="checkbox"/> community room <input type="checkbox"/> computer room <input type="checkbox"/> on-site services
Age in Years					
Housing Services	<input type="checkbox"/> live-in manager <input type="checkbox"/> security personnel <input type="checkbox"/> social services/medical personnel	<input type="checkbox"/> live-in manager <input type="checkbox"/> security personnel <input type="checkbox"/> social services/medical personnel	<input type="checkbox"/> live-in manager <input type="checkbox"/> security personnel <input type="checkbox"/> social services/medical personnel	<input type="checkbox"/> live-in manager <input type="checkbox"/> security personnel <input type="checkbox"/> social services/medical personnel	<input type="checkbox"/> live-in manager <input type="checkbox"/> security personnel <input type="checkbox"/> social services/medical personnel
Utilities (type)	<input type="checkbox"/> Gas (heating) <input type="checkbox"/> Gas (cooking) <input type="checkbox"/> Gas (water heating) <input type="checkbox"/> Electric (heating) <input type="checkbox"/> Electric (cooking) <input type="checkbox"/> Electric (other) <input type="checkbox"/> Air conditioning <input type="checkbox"/> Water <input type="checkbox"/> Sewer <input type="checkbox"/> Trash	<input type="checkbox"/> Gas (heating) <input type="checkbox"/> Gas (cooking) <input type="checkbox"/> Gas (water heating) <input type="checkbox"/> Electric (heating) <input type="checkbox"/> Electric (cooking) <input type="checkbox"/> Electric (other) <input type="checkbox"/> Air conditioning <input type="checkbox"/> Water <input type="checkbox"/> Sewer <input type="checkbox"/> Trash	<input type="checkbox"/> Gas (heating) <input type="checkbox"/> Gas (cooking) <input type="checkbox"/> Gas (water heating) <input type="checkbox"/> Electric (heating) <input type="checkbox"/> Electric (cooking) <input type="checkbox"/> Electric (other) <input type="checkbox"/> Air conditioning <input type="checkbox"/> Water <input type="checkbox"/> Sewer <input type="checkbox"/> Trash	<input type="checkbox"/> Gas (heating) <input type="checkbox"/> Gas (cooking) <input type="checkbox"/> Gas (water heating) <input type="checkbox"/> Electric (heating) <input type="checkbox"/> Electric (cooking) <input type="checkbox"/> Electric (other) <input type="checkbox"/> Air conditioning <input type="checkbox"/> Water <input type="checkbox"/> Sewer <input type="checkbox"/> Trash	<input type="checkbox"/> Gas (heating) <input type="checkbox"/> Gas (cooking) <input type="checkbox"/> Gas (water heating) <input type="checkbox"/> Electric (heating) <input type="checkbox"/> Electric (cooking) <input type="checkbox"/> Electric (other) <input type="checkbox"/> Air conditioning <input type="checkbox"/> Water <input type="checkbox"/> Sewer <input type="checkbox"/> Trash
Unit Rent					
Utility Allowance					
Gross Rent					
Handicap Accessible (circle)	Yes No	Yes No	Yes No	Yes No	Yes No
Certification					
a.) The gross rent for this proposed housing unit is determined to be <u>reasonable in comparison</u> to similar properties, as evidenced in this form. <input type="checkbox"/> Yes <input type="checkbox"/> No					
<i>If the unit selected for the participant is <u>NOT</u> reasonable in comparison to the above listed properties, you must include a justification as to why this property was selected:</i>					
<i>Additional Comments:</i>					

b.) Rent for an unassisted unit by the same property owner is comparable.

- Yes
- No
- N/A

Cost of Rent for unassisted unit _____.

If unit is NOT comparable, include an explanation:

Additional Comments:

Fair Market Rent (ESG-Funded Projects ONLY)

Unit Size:

FMR:

The gross rent for this proposed housing unit is equal to or less than Fair Market Rent for this size unit.

- Yes
- No

Name: _____

Title: _____

Signature: _____

Date: _____

FINANCIAL ASSISTANCE

Policy: The DSM/Polk CoC shall have procedures in place for determining when other financial assistance will be paid.

Procedure: Minimum standards for determining when other financial assistance will be paid:

ESG-FUNDED PROGRAMS

FINANCIAL ASSISTANCE (RRH)

- Financial assistance should be provided in amounts sufficient to ensure the likelihood of positive housing outcomes after the assistance has ended.
- Financial assistance provided to participants under ESG-funded RRH programs may not exceed the limitations set forth in **Appendix D**.

CoC-FUNDED PROGRAMS

FINANCIAL ASSISTANCE (RRH)

- Financial assistance should be provided in amounts sufficient to ensure the likelihood of positive housing outcomes after the assistance has ended.
- Financial assistance provided to participants under-CoC-funded RRH programs may not exceed the limitations set forth in **Appendix D**.

HOUSNG STABILIZATION AND/OR RELOCATION SERVICES

Policy: The DSM/Polk CoC shall have procedures in place for determining the type, amount, and duration of housing stabilization and/or relocation services.

Procedure: The minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to program participants as are follows:

ESG-FUNDED PROGRAMS

Eligible Services:

- Eligible services that ESG ~~and CoC~~-funded RRH projects may provide to help program participants in locating, obtaining, and retaining suitable permanent housing can be found in **Appendix D** Housing Services & Related Services.

Minimum Program Requirements:

- The program must offer a standard, basic level of support to all landlords who lease to program households. This support must be detailed in a written policy distributed to landlords.
- The program must have a detailed policy covering the type, amount and duration of assistance provided to help households find and secure housing.
 - Program staff must explain and distribute this policy to households upon entry to the program.
- The program must also have a written policy that requires staff to explain to household's basic landlord-tenant rights and responsibilities and the requirements of their specific lease.
- The program must provide households with multiple housing choices within practical constraints.

- The program must help households make informed housing choices with the goal that the household will be able to maintain their housing after leaving the program.
- The program must issue checks quickly and on time and must have the capacity to track payments to landlords and other vendors.
- The program must have the capacity to pay reasonable back rent and utility arrears that directly prevent a household from being able to sign a lease. Rent arrears cannot be paid once they are in collections

CoC-FUNDED PROGRAMS

Eligible Services:

- Eligible services that CoC-funded RRH projects may provide to help program participants in locating, obtaining, and retaining suitable permanent housing can be found in **Appendix D**, Housing Services & Related Services.

Minimum Program Requirements:

- The program must offer a standard, basic level of support to all landlords who lease to program households. This support must be detailed in a written policy distributed to landlords.
- The program must have a detailed policy covering the type, amount and duration of assistance provided to help households find and secure housing.
 - Program staff must explain and distribute this policy to households upon entry to the program.
- The program must also have a written policy that requires staff to explain to household's basic landlord-tenant rights and responsibilities and the requirements of their specific lease.
- The program must provide households with multiple housing choices within practical constraints.
- The program must help households make informed housing choices with the goal that the household will be able to maintain their housing after leaving the program.
- The program must issue checks quickly and on time and must have the capacity to track payments to landlords and other vendors.
- The program must have the capacity to pay reasonable back rent and utility arrears that directly prevent a household from being able to sign a lease. Rent arrears cannot be paid once they are in collections

HOUSNG STABILITY CASE MANAGEMENT

Policy: The DSM/Polk CoC shall have procedures in place for assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability

Procedure: The minimum standards for assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability as are follows:

ESG-FUNDED PROGRAMS

Eligible Services:

- Eligible case management and supportive services that ESG ~~and CoC~~-funded RRH projects may provide to participants can be found in **Appendix D**.
 - ESG-funded RRH: Case management services provided to a program participant seeking permanent housing can only be provided for up to 30 days.

- Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations, shall be determined by the individual service provider’s policies, and clearly communicated to participants.

Minimum Program Requirements (Unless otherwise identified, requirements apply to PSH, RRH & TH-RRH):

- Case managers must **actively** help program participants to find housing as quickly as possible including working closely with the CI housing navigator to match the household to an appropriate unit.
- Case managers shall be trained in RRH case management strategies and related evidence-based practices as well as on program policies and community resources. (RRH & TH-RRH)
- Case managers are expected to meet with participants in their homes and must have a minimum of one contact per month with participants. All contact between case managers and participants shall be documented in case notes.
- Case managers must respect participants’ homes as they do their own, scheduling appointments ahead of time, only entering when invited in, and respecting personal property and the participant’s wishes.
- Programs must have clear safety procedures for home visits. They must train their staff in these procedures, post the procedures in a clearly visible manner in their offices, inform participants about the procedures at intake, and, if and when changes are made, communicate the changes to participants and staff.
- Programs must have clearly defined, or actively be working to establish, relationships with employment and income programs that they can refer participants to when appropriate.
- Programs must have clearly defined policies and objective standards about when case management should be continued and ended.
- At enrollment or within 72 hours of enrollment, the case manager must conduct a tenancy barriers assessment.
- Case managers must connect participants to community resources that help them to (1) resolve or navigate tenant problems that landlords may screen for on rental applications, (2) obtain necessary documentation, (3) prepare for successful tenancy, and (4) successfully accomplish other move-in activities.
- The case manager must offer opportunities for participants to learn basic tenancy skills.
- The case manager must work directly with the household and landlord to resolve tenancy issues without threatening the household’s tenancy.
- When appropriate, case managers should work with participants to build their communication skills so they can better respond to or negotiate with a landlord.
- When necessary, case managers should help households avoid evictions and maintain positive relationships
- Housing plans for individual participants should focus on how the participant can maintain a lease and address barriers to housing retention; on improving the participant’s understanding of landlord/tenant rights and responsibilities; and on addressing other issues that have, in the participant’s past, resulted in housing crises or housing loss.
- Case managers should make referrals to appropriate community and mainstream resources as needed.

CoC-FUNDED PROGRAMS

Eligible Services:

- Eligible case management and supportive services that CoC-funded RRH projects may provide to participants can be found in **Appendix D**.

- Supportive services may be provided for no longer than 6 months after the RRH rental assistance has stopped.
- Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations, shall be determined by the individual service provider's policies, and clearly communicated to participants.

Minimum Program Requirements (Unless otherwise identified, requirements apply to PSH, RRH & TH-RRH):

- Case managers must **actively** help program participants to find housing as quickly as possible including working closely with the CI housing navigator to match the household to an appropriate unit.
- Case managers shall be trained on RRH case management strategies and related evidence-based practices as well as on program policies and community resources. (RRH & TH-RRH)
- Case managers are expected to meet with participants in their homes and must have a minimum of one contact per month with participants. All contact between case managers and participants shall be documented in case notes.
- Case managers must respect participants' homes as they do their own, scheduling appointments ahead of time, only entering when invited in, and respecting personal property and the participant's wishes.
- Programs must have clear safety procedures for home visits. They must train their staff on these procedures, post the procedures in a clearly visible manner in their offices, inform participants about the procedures at intake, and, if and when changes are made, communicate the changes to participants and staff.
- Programs must have clearly defined, or actively be working to establish, relationships with employment and income programs that they can refer participants to when appropriate.
- Programs must have clearly defined policies and objective standards about when case management should be continued and ended.
- At enrollment or within 72 hours of enrollment, the case manager must conduct a tenancy barriers assessment.
- Case managers must connect participants to community resources that help them to (1) resolve or navigate tenant problems that landlords may screen for on rental applications, (2) obtain necessary documentation, (3) prepare for successful tenancy, and (4) successfully accomplish other move-in activities.
- The case manager must offer opportunities for participants to learn basic tenancy skills.
- The case manager must work directly with the household and landlord to resolve tenancy issues without threatening the household's tenancy.
- When appropriate, case managers should work with participants to build their communication skills so they can better respond to or negotiate with a landlord.
- When necessary, case managers should help households avoid evictions and maintain positive relationships
- Housing plans for individual participants should focus on how the participant can maintain a lease and address barriers to housing retention; on improving the participant's understanding of landlord/tenant rights and responsibilities; and on addressing other issues that have, in the participant's past, resulted in housing crises or housing loss.
- Case managers should make referrals to appropriate community and mainstream resources as needed.

PROGRAM OPERATIONS POLICIES

Policy: The DSM/Polk CoC shall ensure that policies and procedures have been established by ESG and COC-funded projects which are consistent and uniform across program components to ensure program participants receive the same type, amount, and duration of services.

Procedure: The minimum standards for assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability as are follows (Unless otherwise identified, requirements apply to PSH, RRH & TH-RRH):

- Case managers' job, or similar position, descriptions must direct them to focus on housing and to use strengths-based and trauma informed practices.
- The program must offer a standard, basic level of support to all landlords who lease to program households. This support must be detailed in a written policy.
- The program must have a detailed policy covering the type of assistance provided to help households find and secure housing. Program staff must explain and distribute this policy to households upon entry to the program. The program must also have a written policy that requires staff to explain to household's basic landlord-tenant rights and responsibilities and the requirements of their specific lease.
- The program must have clearly defined policies and procedures for determining the amount of financial assistance provided to a household, as well as defined and objective standards for determining when case management and financial assistance should continue and end (RRH & TH_RRH).
- The program must have clearly defined, written standards for participant assessments and intake, determination of participants' eligibility, initial evaluation (certification) of participants, reevaluation (recertification) of participants, terminating assistance, appeals of terminations, emergency transfers under the Violence Against Women Act (VAWA), and participant files.
- When households are expected to pay an amount toward their housing, the program must have written policies and procedures for determining that amount and communicating it to the participant.
- A progressive approach must be used to determine the duration and amount of rental assistance. Policies detailing this approach should cover decision-making guidelines and reevaluation processes (RRH & TH-RRH).

EMERGENCY SHELTER (ESG)

ESG-funded emergency shelters must establish policies and procedures for:

- Admission
- Rapid resolution
- Referral
- Discharge
- Standards regarding length of stay if any
- Safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest
- Assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter; and
- Documenting the shelter's compliance with HUD Habitability Standards.

TRANSITIONAL HOUSING (CoC)

Transitional housing programs that only receive operations funds through HUD's Continuum of Care Program must establish policies and procedures to ensure that participants reside in decent, safe, and sanitary housing.

- These policies and procedures must include:
 - The process by which each housing unit will be inspected for HUD Housing Quality Standards by a City of Des Moines inspector at initial program startup and every time a youth moves out and before another youth moves into the unit.
 - The process for ensuring the housing unit will remain compliant with HQS during a youth's occupancy, including how damages or needed repairs are reported and addressed.
- Failure to have the unit(s) inspected at startup or prior to a new youth moving in will result in non-payment of the program's reimbursement request.

PERFORMANCE MEASURES BY COMPONENT TYPE

CoC and ESG performance measures are developed by the Homeward Board's Performance Committee and submitted to the board for approval. Progress toward performance measures is reviewed quarterly by the Performance Committee. If necessary, the Performance Committee will annually recommend to the board new performance measures or adjustments in the targets of current performance measures.

ESG-FUNDED PROGRAMS

EMERGENCY SHELTER¹

- Data Timeliness
 - All project entry and exit assessments are entered in HMIS within 7 days
- Data Completeness
 - All Projects: <2% "Null" values
- Exit Destination Errors
 - Single ES: Total destination error rate <40%
 - Family ES: Total destination error rate <15%

HOMELESSNESS PREVENTION

- Data Timeliness
 - All project entry and exit assessments are entered in HMIS within 7 days
- Data Completeness
 - All Projects: <2% "Null" values
- Remained Permanently Housed After Exit
 - Homelessness Prevention: At least 90% of households assisted will remain permanently housed after ext.

RAPID REHOUSING

- Entering from sources above
 - 90% entering from sources above

- Data Timeliness
 - Entry and exit assessments are entered in HMIS within 7 days
- Data Completeness
 - <2% “Null” values
- Exit Destination Errors
 - Total destination error rate <15%
- Income
 - 25% increase in income from program entry to exit
- Time to Move-in
 - 60 days from the date a client is enrolled in a program and when they actually move into a RRH unit.
- Move-in Error
 - 10% of move-in data entered incorrectly

STREET OUTREACH

- Data Timeliness
 - Entry and exit assessments are entered in HMIS within 7 days
- Data Completeness
 - <2% “Null” values
- Positive Exit (including Emergency Shelter)
 - At least 20% of clients will have a positive exit
- Destination Error Rate
 - Total destination error rate \leq 50%
- Client Inactivity – Client has no “Current Living Situation entry in the last 90 days”
 - Under 10% (available in the ESG CAPER)

CoC-FUNDED PROGRAMS

TRANSITIONAL HOUSING

- Data Timeliness
 - Entry and exit assessments are entered in HMIS within 7 days
- Exit Destination Errors
 - Total destination error rate 5%

RAPID REHOUSING

- Timeliness of HMIS Data Entry
 - All project entry and exit assessments are entered in HMIS within 10 days
- Exit Destination Errors
 - Less than 10%
- Average Length of Time from Enrollment to Housing Move-In
 - Goal is 90 days
- Successful Exits
 - 72% of program participants will successfully exit to permanent housing
- Income Increases
 - 25% of all adult participants will increase total income from entry to exit

PERMANENT SUPPORTIVE HOUSING

- Timeliness of HMIS Data Entry
 - Entry and exit assessments are entered in HMIS within 7 days
- Exit Destination Errors
 - ≤5%
- Average Length of Time from Enrollment to Housing Move-In
 - Goal is 90 days
- Successful Retention
 - 93% of program participants will successfully exit to/retain permanent housing
- Income Increases
 - Q1: 15%, Q2: 20%, Q3: 25%, Q4: 30%

YHDP PROJECTS

The [Polk County/Des Moines YHDP Coordinated Community Plan](#) details desired outcomes YHDP- funded projects. YHDP projects are required to meet the performance measures for their project type (i.e., TH, RRH and PSH), listed in the above sections. Additional measures tracked specific to YHDP TH-RRH and RRH programs include

- Percentage of youth that move into permanent housing with 90 days
- Percentage of youth enrolled in the program that remain stably housed for at least 12 months
- Percentage of youth that exit to permanent housing at discharge
- Percentage of youth who increase their total income
- Percentage of youth interested in education, training, or employment who are connected to services
- Percentage of youth who develop at least one positive permanent relationship with a trusting adult

The YHDP Steering Committee, Youth Action Council, and Homeward will oversee Continuous Quality Improvement efforts for YHDP-funded projects and review performance on a quarterly basis. Continuous Quality Improvement will include both quantitative and qualitative feedback. Exit interviews and post-exit surveys will also be utilized to collect client feedback on the implementation of the guiding principles.

APPENDIX A: HUD HOMELESS DEFINITION CATEGORIES

Category	Definition	Required Documentation
<p>Category 1 – Literally Homeless</p>	<p>Household lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> a. Has a primary nighttime residence that is a public or private place not meant for human habitation; b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> c. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution 	<ul style="list-style-type: none"> • Written observation by the outreach worker; or • Written referral by another housing or service provider; or • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; <p>For individuals exiting an institution – one of the forms of evidence above and:</p> <ul style="list-style-type: none"> ○ Discharge paperwork or written/oral referral, or ○ Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution
<p>Category 2 – Imminent Risk of Homelessness</p>	<p>Household will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> a. Residence will be lost within 14 days of the date of application for assistance; <u>AND</u> b. No subsequent residence has been identified; <u>AND</u> c. Household lacks the resources or support networks needed to obtain other permanent housing 	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the household that they must leave; or • For households leaving a hotel or motel – evidence that they lack the financial resources to stay; or • A documented and verified oral statement; and • Certification that no subsequent residence has been identified; and • Self-certification or other written documentation that the household lacks the financial resources and support necessary to obtain permanent housing

Category	Definition	Required Documentation
Category 3 – Homeless under other Federal Statutes	Not Applicable in the DSM/Polk CoC	
Category 4 – Fleeing/ attempting to flee domestic violence	Any household who: <ul style="list-style-type: none"> a. Is fleeing, or is attempting to flee, domestic violence; b. Has no other residence; AND c. Lacks the resources or support networks to obtain other permanent housing 	<ul style="list-style-type: none"> • <i>For victim service providers:</i> <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker • <i>For non-victim service providers:</i> <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where safety is not jeopardized, the oral statement must be verified; and ○ Certification by the individual or head of household that no subsequent residence has been identified; and ○ Self-certification, or other written documentation, that the household lacks the financial resources and support to obtain other permanent housing.

APPENDIX B: AT RISK OF HOMELESSNESS DEFINITIONS

Category	Definition
Category 1 – Individuals and Families	<p>An individual or family who:</p> <ol style="list-style-type: none"> 1. Has an annual income below 30% of median family income for the area; AND 2. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND 3. Meets one of the following conditions: <ol style="list-style-type: none"> (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR (B) Is living in the home of another because of economic hardship; OR (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR (F) Is exiting a publicly funded institution or system of care; OR (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan
Category 2 – Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition but qualifies as homeless under another Federal statute.
Category 3 – Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

APPENDIX C: HUD CPD NOTICE 17-11

[HUD CPD Notice 17-11](#)

APPENDIX D: SUMMARY OF ELIGIBLE RRH SUPPORTIVE SERVICES

Exhibit 5: Summary of Eligible RRH Supportive Services⁴		
	ESG-RRH 24 CFR part 576.10	CoC-RRH 24 CFR part 578.53
Housing Services & Related Services	<p>Assist participants in locating, obtaining, and retaining suitable permanent housing, including:</p> <ul style="list-style-type: none"> • Housing search • Tenant counseling • Understanding leases • Arranging for utilities • Making moving arrangements • Assessment of housing barriers, needs, and preferences • Development of an action plan for locating housing • Outreach to and negotiation with owners • Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness • Assistance with submitting rental applications 	<p>Assist participants in locating, obtaining, and retaining suitable housing, including:</p> <ul style="list-style-type: none"> • Housing search • Tenant counseling • Understanding leases • Arranging for utilities • Making moving arrangements • Mediation with property owners and landlords • Credit counseling, accessing a free personal credit report, and resolving personal credit issues • Payment of rental application fees⁵
Case Management	<p>Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing by, for example:</p> <ul style="list-style-type: none"> • Conducting the initial evaluation, including verifying and documenting eligibility • Using the centralized or coordinated assessment system • Counseling • Developing, securing, and coordinating services • Obtaining Federal, State, and local benefits • Monitoring and evaluating program participant progress • Providing information and referrals to other providers • Developing an individualized housing and service plan, including planning a path to permanent housing stability • Conducting re-evaluations 	<p>Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participant(s), including:</p> <ul style="list-style-type: none"> • Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking • Using the centralized or coordinated assessment system • Counseling • Developing, securing, and coordinating services • Obtaining Federal, State, and local benefits • Monitoring and evaluating program participant progress • Providing information and referrals to other providers • Developing an individualized housing and service plan, including planning a path to permanent housing stability • Conducting required annual assessment of service needs (re-evaluation)

⁴ From HUD publication *Rapid Re-Housing: ESG vs. CoC*

⁵ Administrative fee collected at lease signing and rental insurance fee are not eligible under “rental application fees”

Exhibit 5: Summary of Eligible RRH Supportive Services

	ESG-RRH 24 CFR part 576.10	CoC-RRH 24 CFR part 578.53
Legal Services	<p>Costs of resolving a legal problem that prohibits a program participant from obtaining or retaining permanent housing. Legal services or activities include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions:</p> <p>(a) <u>Eligible Billing Arrangements</u>. ESG funds may be used only for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys.</p> <p>Costs may be based on:</p> <ul style="list-style-type: none"> • Hourly fees • Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees <p>(b) <u>Ineligible Billing Arrangements</u>. Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements.</p> <p>(c) <u>Eligible Subject Matters</u>. Landlord/tenant matters; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants.</p> <p>(d) <u>Ineligible Subject Matter</u>. Legal services related to immigration and citizenship matters or related to mortgages.</p>	<p>Costs of legal advice and representation in matters that interfere with the homeless individual's or family's ability to obtain and retain housing. Legal services or activities include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions:</p> <p>(a) <u>Eligible Billing Arrangements</u>. CoC funds may be used for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys.</p> <p>Costs may be based on:</p> <ul style="list-style-type: none"> • Hourly fees • Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees <p>(b) <u>Ineligible Billing Arrangements</u>. Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements.</p> <p>(c) <u>Eligible Subject Matters</u>. Landlord tenant disputes; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants.</p> <p>(d) <u>Ineligible Subject Matter</u>. Legal services related to immigration and citizenship matters or related to mortgages and homeownership.</p>
Moving Costs	Costs such as truck rental or hiring a moving company, including payment of temporary storage fees for up to 3 months	Reasonable one-time moving costs, including truck rental and hiring a moving company
Utility Deposit	Standard utility deposit that the utility company requires of all customers	Payment of utility deposit, which constitutes a one-time fee paid to utility companies

Exhibit 5: Summary of Eligible RRH Supportive Services		
	ESG-RRH 24 CFR part 576.10	CoC-RRH 24 CFR part 578.53
Mediation	Mediation between the program participant and the owner or person(s) with whom the participant is living	Mediation with property owners and landlords on behalf of eligible program participants
Credit Repair	<ul style="list-style-type: none"> • Credit counseling • Accessing a free personal credit report • Resolving personal credit problems • Other services needed to assist with critical skills related to household budgeting and money management 	<ul style="list-style-type: none"> • Credit counseling • Accessing a free personal credit report • Resolving personal credit issues
Additional Supportive Services Eligible under CoC-RRH ONLY		
Child Care The costs of establishing and operating child care and providing child care vouchers for children from families experiencing homelessness		
Education Services The costs of improving knowledge and basic educational skills		
Employment Assistance and Job Training The costs of establishing and operating employment assistance and job training programs		
Food The cost of providing program participants with meals or groceries		
Life Skills Training The costs of teaching 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		
Mental Health Services The direct outpatient treatment of mental health conditions by licensed professionals		
Outpatient Health Services The direct outpatient treatment of medical conditions by licensed medical professionals		
Outreach Services Activities to engage persons for the purpose of providing immediate support and intervention and for identifying potential program participants		
Substance Abuse Treatment Services The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing		
Transportation Costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other eligible services		

APPENDIX E: COMMON TERMS, ACRONYMS AND DEFINITIONS

Area Median Income (AMI) – AMI is based upon income data for the state and local jurisdiction in which a household resides and is dependent on the size of the household. The AMI for each state and county can be found at: <http://huduser.org/DATASETS/il.html>.

Case Manager – The staff person assigned to assist a program participant in obtaining and/or maintaining permanent housing through needs assessment, coordination of services and advocating on behalf of the participant.

Centralized Intake – Polk County Continuum of Care’s coordinated entry system to provide a single “front door” for homeless individuals and families seeking shelter and assistance. The system includes common intake, assessment and prioritization tools and process, referrals and placement decisions based on client needs, inventory of resources for emergency shelter, housing and services, and consistent opportunities for prevention or diversion to appropriate resources, supportive services, and permanent housing.

Chronically Homeless (HUD definition):

(1) A “homeless individual with a disability,” as defined in the Act, who:

- Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months

(2) An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Continuum of Care (CoC) – A collaborative planning body designed to address homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs. It is the body responsible for meeting the goals of HUD’s Continuum of Care Program.

Emergency Shelter (ES) – A facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for persons experiencing homelessness.

Fair Market Rent – Based on the Department of Housing and Urban Development’s estimate of the amount of money a property would rent or lease for if it was available at this time based on the county and state the property is located in. Fair market rent is based upon 24 CFR 888 and 24 CFR 982.503.

Homeless Management Information System (HMIS) – A computerized data collection system that stores information about persons experiencing homelessness, collected throughout the community from the various agencies that provide services to these individuals. Client-level information collected from

each program can be aggregated with data from other programs using a unique client identifier to determine unduplicated system wide information, such as the overall level of homelessness, service effectiveness, and unmet community needs.

Joint TH and PH-RRH Component Project – The Joint TH and PH-RRH component project combines two existing program components – transitional housing and permanent housing-rapid rehousing – in a single project to serve individuals and families experiencing homelessness. Program participants may only receive up to 24 months of total assistance.

Living in Unsafe Situations – unaccompanied youth aged 24 and under and families headed by youth aged 24 and under who have an unsafe primary nighttime residence and no safe alternative to that residence.

Permanent Supportive Housing (PSH) – Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Program Participant – An individual (including unaccompanied youth) or family who is assisted with Continuum of Care and/or ESG program funds.

Rapid Re-Housing (RRH) – An intervention that rapidly connects families and individuals experiencing homelessness to permanent housing through housing identification, rent and move-in assistance, and case management and services.

Rapid Resolution – An intervention designed to empower persons facing imminent homelessness to identify safe and appropriate housing options (other than the street/car/shelter) and assisting them in avoiding shelter and returning immediately to housing. Rapid Rehousing emphasizes the use of services, problem-solving conversations, and financial assistance to help households be diverted from homelessness or rapidly exit homelessness.

Rent Reasonableness – Rents must be compared to other unassisted units in similar locations within the marketplace per 24 CFR 982.507.

Victim Service Provider – A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) – evidence-based screening tool used to determine prioritization for case management, housing programs, and/or referrals. The VI-F-SPDAT is utilized for family screening and TAY-SPDAT is used for transition age youth (16-24 years old).

Youth –Serving Provider - a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under.