MI Balance of State CoC Program Standards for Rapid Rehousing

Rapid rehousing is an eligible activity within the Michigan Balance of State Continuum of Care (MIBOSCOC) for both the Emergency Solutions Grant and the Continuum of Care Program. To provide continuity of service to all being served with Rapid Rehousing throughout the MIBOSCOC, the MIBOSCOC is providing programmatic requirements for services except in cases where there are differences in the regulatory requirements. In these cases, the separate expectations are clearly noted.

All rapid rehousing projects should adhere to a Housing First philosophy and it is the expectation of the MIBOSCOC that all funded projects adopt this model of care. Housing First is the philosophy that people need basic necessities like food and a place to live before attending to anything else, like getting a job, budgeting appropriately, or attending to substance use issues. Housing choice is highly valued in a Housing First model and is a voluntary model of care for persons experiencing homelessness. Housing First does not mandate participation in services before obtaining housing or in order to maintain housing.

Core Components of Rapid Rehousing:
Rapid rehousing is an intervention designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve stability in that housing. Rapid rehousing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are tailored to the unique needs of the household. The core components of a Rapid rehousing project are:
- Housing identification and relocation,
- Short-and/or medium-term rental assistance and move-in (financial) assistance, and
- Case management and housing stabilization services.

Households are not required to utilize all three core components but in order to meet the project standards in this document, all components must be offered to project participants.

Project Service Standards:

Project service standards are used to guide and measure consistent implementation of the rapid rehousing model. These standards address each aspect of the rapid rehousing process, from eligibility to project exit. MIBOSCOC developed the following rapid rehousing standards for ESG and CoC Program funded rapid rehousing projects to ensure:
- Project accountability to all population groups (individuals, families, veterans, youth, survivors of violence) experiencing homelessness;
- Project compliance with HUD, project uniformity, and common participant expectations;
- Adequate project staff competence and training; and
- That agencies have a set of standards for which to guide their programming.

Eligibility:

All programs throughout the MIBOSCOC must comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable.

MSHDA ESG Rapid Rehousing

See MSHDA policy and procedure for MSHDA ESG Rapid Rehousing Program.
https://www.michigan.gov/mshda/homeless/homeless-and-special-housing-needs-programs/emergency-solutions-grant-esg-program

Supportive Services for Veteran Families (SSVF)

See SSVF Program Guide for SSVF policies and procedures.
https://www.va.gov/homeless/ssvf/

HUD COC RRH

HUD Continuum of Care Rapid Rehousing assistance can be provided to individuals and families defined as homeless under any of the following three categories included in the HUD federal definition of homeless:

- Literally homeless (Category 1): An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
    - (i) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
    - (ii) an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low- income individuals); *or*
    - (iii) an individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- Imminent Risk of Homelessness (Category 2): Individual or family who will imminently lose their primary nighttime residence, provided that:
    - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
    - (ii) No subsequent residence has been identified; **and**
    - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- Fleeing Violence (Category 4): An individual or family who is:
    - (i) Fleeing or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
    - (ii) Has no other residence; **and**
    - (ii) Lacks the resources or support networks, e.g., family, friends, and faith- based or other social networks, to obtain other permanent housing.

The CoC Program Notice of Funding Availability (NOFA) imposes additional eligibility requirements not reflected in the regulation. Projects funded to carry out RRH assistance under the CoC program must

follow both CoC Program NOFA and regulatory requirements (ex. OMB requirements, restricting to Category 1 and 4).

Standards for Documenting Eligibility

The following documentation requirements are listed in order of preference for each category of homelessness. Any funder created documents for this purpose should be used by the service provider. Such as with MSHDA ESG projects, the grant specific certification documents by MSHDA should be used. The service provider and/or referring agency are required to provide the following documentation in order to prove eligibility for homeless programming:

- Literally Homeless (Category 1):
  1. Written observation by the outreach worker; _**or**_
  2. Written referral by another housing or service provider;_ **or**_
  3. Certification by the individual or head of household seeking assistance stating that they are living on the streets or in shelter;
  4. For individuals exiting an institution, one of the form of evidence above and:
     - 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 the institution.
- Imminent Risk of Homelessness (Category 2):
  1. A court order resulting from an eviction notifying the individual or family that they must leave; _**or**_
  2. For individual and families leaving a hotel or motel with evidence that they lack the financial resources to stay; _**or**_
  3. A documented and verified oral statement; **_and_**
  4. Certification that no subsequent residence has been identified; **_and_**
  5. Self-certification or other written documentation that they individual lacks the financial resources and support necessary to obtain permanent housing.
- Fleeing/Attempting to Flee Violence (Category 4):
  - For victim service providers:
    - 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.
  - For non-victim service providers:
    - 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 they safety of the individual or family is not jeopardized, the oral statement must be verified; **_and_**
    - Certification by the individual or head of household they 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.

Citation: https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf

Prioritization:

MIBOSCOC follows national best practices in the prioritization of housing resources to prioritize the most vulnerable persons/households for the limited housing resources available. The full prioritization policy for the MIBOSCOC can be found in the MIBOSCOC Coordinated Entry Policy. Prioritization uses a standardized assessment tool and evaluates for eligibility criteria for all project types throughout the CoC, taking into account client choice.

Housing Identification:

Housing Identification is the first core component of rapid re-housing, the goal of which is to find housing for project participants quickly. Activities under this core component include recruiting landlords with units in the communities and neighborhoods where project participants want to live and negotiating with landlords to help project participants access housing.

Principles

- Within the limits of the participant's income, a rapid rehousing project should have the ability to help households access units that are desirable and sustainable—those that are in neighborhoods where they want to live in, that have access to transportation, are close to employment, and that are safe.
- Housing identification efforts should be designed and implemented to actively recruit and retain landlords and housing managers willing to forego or adjust their typical tenant screening criteria in order to rent to project participants who may have otherwise been screened out.
- Critical to the formation of landlord-project relationship is the recognition of the landlord as a vital partner. The rapid rehousing provider must be responsive to landlords to preserve and develop those partnerships for future housing placements.

Project Staffing

- Projects should designate staff whose responsibility is to identify and recruit landlords and encourage them to rent to homeless households served by the project. Staff have the knowledge, skills, and agency resources to understand landlords' perspectives, understand landlord and tenant rights and responsibilities, and negotiate landlord supports. The project's case managers must be trained in this specialized skill set to perform the recruitment function effectively.
- The project should have standard procedures to onboard new staff and to keep staff regularly updated on new strategies, policies, and housing assistance options in the community.

Project Policies

- The project should have written policies and procedures for landlord recruitment activities, including screening out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices.
- The project should outline standard, basic level of support to all landlords who lease to project participants. This support is detailed in a written policy and distributed to landlords. The project can negotiate additional supports, as needed, on a case-by-case basis.
- The project should have a detailed policy for the type of assistance provided to help participants find and secure housing. Staff explain and distribute this policy to participants at entry to the project. Some participants may decline assistance in finding housing, but the project should check on their progress and offer advice and/or direct assistance if they encounter obstacles they cannot resolve independently.

Project Activities

- The project should continually engage in the recruitment and retention of landlord partners and has methods of tracking landlord partners and unit vacancies, unit locations, characteristics, and costs.
- The project should provide participants with multiple housing choices within practical constraints. The onus is on the project to provide these housing choices, but this does not preclude project participants from conducting their own search and choosing housing they identify independently.
- The project should assist participants in making an informed housing choice with the goal that the participant will be able to maintain after program exit. While participants ultimately chose their housing unit, a project uses housing and budgeting plans that help a participant understand the likelihood of being able to pay rent and meet the requirements of the lease by the end of assistance.
- When ending rental assistance, the project should provide information to landlords about how they can contact the project again if needed and what kind of follow-up assistance may be available.

Examples of Meeting Project Standards

Housing identification projects that meet the above standards include those that:

- Recruit landlords through word of mouth; cold outreach to posted ads; driving around prospective neighborhoods looking for rent signs; soliciting references from partners; Craigslist and other websites, other media; and/or through presentations at local service clubs, religious organizations, and landlord associations, and collaborative approaches with local elected officials and government agencies.
- Provide contact information to landlords to reach appropriate staff, respond to landlord calls within one business day, mediate disputes between project participants and landlords, ensure payment for damage caused to units, and assure rental payments are made on time.
- Contact local tenant rights organizations to identify landlords who fail to comply with licensing/ building requirements and/or fail to correct violations; review housing court records; and/or survey program participants about their satisfaction with landlords to identify patterns in landlord behavior that would suggest they should not be project partners.
- Be familiar with the screening information landlords collect to identify prospective tenants. This information can help match project participants with landlords and units.

Rent, Move-In Assistance and Ongoing Rental Subsidy:

The goal of which is to provide short-term help to households so they can pay for housing. Activities under this core component include paying for security deposits, move-in expenses, rent, and utilities.

Principles

- Rent and move-in assistance should be flexible and tailored to the varying and changing needs of a participant household while providing the assistance necessary for households to move immediately out of homelessness and to stabilize in permanent housing.
- A rapid rehousing project should make efforts to maximize the number of households it is able to serve by providing households with the financial assistance in a progressive manner, providing only the assistance necessary to stabilize in permanent housing.

Project Staffing

- Project staff should be trained on the regulatory requirements of all rapid rehousing funding streams and on the ethical use and application of a project's financial assistance policies, including, but not limited to, initial and ongoing eligibility criteria, project requirements, and assistance maximums. The project should have a routine way to onboard new staff and to keep staff regularly updated on changing regulations and/or project policies.

Project Policies

- Per 24 CFR part 578.37(a)(1)(ii)), CoCs must establish standards for determining 1) what percentage or amount of rent each project participant must pay while receiving rapid rehousing assistance, 2) the maximum amount or percentage of rental assistance that a project participant may receive, 3) the maximum number of months that a project participant may receive rental assistance; and 4) the maximum number of times that a project participant may receive rental assistance.
- The MIBOSCOC leaves it up the project to set its own caps and conditions related to the amount and duration of rental assistance. However, the expectation of the MIBOSCOC is that all rapid rehousing projects should follow the following principles when deciding their standards either at the project or client level:
    - o Housing Stability Plan with Exit Strategy: Project staff should develop a housing stability plan that is driven by participant goals and choice within the initial week of housing. The housing stability plan will include an estimated amount and duration of rental support the participant and the project staff agree upon. The duration of rental assistance each participant will receive will be determined by the participant's plans to reduce the amount of financial assistance required over time. In doing so, the project staff and the participant should consider the participant's current or expected income and expenses; other public or private assistance for which the project participant will be eligible and likely to receive; and the relative affordability of available housing in the area. Guidelines should be flexible enough to respond to the varied and changing needs of project participants, including participants with zero income.
- A progressive approach is used to determine the duration and amount of rent assistance. Financial assistance is not a standard "package" and is flexible enough to adjust to participants' unique needs and resources, especially as participants' financial circumstances or housing costs change.

Project Activities

- The project should provide when needed—either directly or through formal agreement with another organization or agency—financial assistance for housing costs, which may include rental deposits, first month's rent, and temporary rental assistance.
- The project should issue checks quickly and on time and have the capacity to track payments to landlords and other vendors.
- The project should help participants meet basic needs at move-in, either through agency donation or resource referrals.
- The transition of financial assistance should be coordinated with case management efforts to assist program participants to assume and sustain their housing costs.

Examples of Meeting Project Standards
Projects that meet the above standards for rent and move-in assistance include those that:
- Utilize income-based, shallow and/or deep subsidy structures that expect participants with income to contribute toward their rent and other costs, and that move as quickly as appropriate to reduce or end subsidies.
- Have a policy they provide to program participants that says assistance is determined based on individualized housing plans/case plans/participant goals and needs, and also makes clear any limits to financial assistance required by their funder(s) or established by the project.
- Have established processes for approval, review, and modification of types/levels of financial assistance.
- Have policies that inform participants that the project is intended to be of short duration, and practices that encourage participants to believe in their ability to sustain their housing and that reduce reliance on the project.
- Have policies that reduce or end subsidies whenever appropriate, leaving open the possibility that a participant may return for more assistance, rather than continuing support.

Rapid Rehousing Case Management and Services:

Rapid rehousing case management and services are the third core component of rapid rehousing. The goals of rapid rehousing case management are to help participants obtain and move into permanent housing, support participants to stabilize in housing, and connect them to community and mainstream services and supports if needed.

Principles

- Rapid rehousing case management should be participant driven. Case managers should actively engage participants in voluntary case management and service participation by creating an environment in which the participant is driving the case planning and goal-setting based on what they want from the project and services, rather than on what the case manager decides they need to do to be successful.
- Rapid rehousing case management should be flexible in intensity—offering only essential assistance until or unless the participant demonstrates the need for or requests additional help. The intensity and duration of case management is based on the needs of individual households and may lessen or increase over time.
- Rapid rehousing case management uses a strengths-based approach to recognize the strengths and skills participants bring to the situation and prevent a power imbalance between participant and case manager. Case managers identify the inherent strengths of a person or family instead of diagnoses or deficits, then build on those strengths to support the participant's success.
- Rapid rehousing program case management reflects the short-term nature of the rapid rehousing assistance. It focuses on housing retention and helping a participant build a support network outside of the project. It connects the participant with community resources and service options, such as legal services, health care, vocational assistance, transportation, childcare, and other forms of assistance, that continue beyond participation in the rapid rehousing program.
- Many communities do not have adequate availability of housing for participants with high acuity that may also fit the eligibility for permanent supportive housing (PSH). In these cases, communities are encouraged to follow the best practice of "dynamic system prioritization" which

may result in higher acuity participants placed in rapid rehousing projects. In these situations, all above case management standards should be followed, with the additional understanding that exit planning might be best done to another permanent subsidy or homeless service project. These participants will most likely require more case management time and caseloads should be adjusted correspondingly.

- Caseloads should not exceed an amount that allows staff to engage with all participants as required and be available to respond quickly to participant emergencies. Caseloads should be flexible enough to account for participants requiring additional assistance and where the participants are in the housing process. It is recommended that rapid rehousing caseloads do not exceed 25 participants. There is no minimum required caseload as long as the provider is able to fulfill funder expectations for the number of participants served.

Project Staff

- The case manager job descriptions should direct case managers to focus on housing and to use strengths-based practices focused on participant engagement and meeting the unique needs of each household.
- Case managers should be trained on rapid rehousing case management strategies and related evidence-based practices as well as program policies and community resources. Additionally, a project has a regular process for onboarding new staff and regularly updating the training of current staff.
- At minimum, required staff training should include MIBOSCOC supported training in: Housing First Practices, Implicit Bias, Trauma-Informed Service Provision, and Motivational Interviewing.

Project Policies

- Except where dictated by the funder, program participants should direct when, where, and how often case management meetings occur. Meetings occur in a participant's home and/or in a location of the participant's choosing whenever possible.
- Case managers respect a program participant's home as their own, scheduling appointments ahead of time, only entering when invited in, and respecting the program participant's personal property and wishes while in their home.
- When case management and service compliance is not mandated by federal or state regulation, services offered by a project have voluntary participation.
- The project should have clear safety procedures for home visits that staff are trained on and that are posted clearly visible in office space and shared with program participants at intake, and shared with participants and staff whenever changes are made.
- The project should clearly defined relationships with employment and income programs that it can connect program participants to as appropriate.
- The project should have clearly defined policies and objective standards for when case management should continue and end. These guidelines are flexible enough to respond to the varied and changing needs of program participants. In instances where cases are continued outside of these defined policies and objective standards, there is a review and approval process.

Project Activities

Project activities for rapid rehousing case management are grouped into categories that will contribute to the specific goals of rapid rehousing case management. The project activities listed here are not

exclusively provided in a linear progression and can be administered in whatever order and intensity is most appropriate for a participant.

Obtain and Move into Permanent Housing

- Assessments completed prior to housing should be limited and focus on those things necessary to support health and safety and resolve the housing crisis as quickly as possible.
- The project should have resources and/or be able to connect participants to community resources that help participants: resolve or navigate tenant problems (like rental and utility arrears or multiple evictions) that landlords may screen for on rental applications; obtain necessary documentation such as identification; prepare participants for successful tenancy by reviewing lease provisions; and support other move-in activities.
- The project should offer learning opportunities which can include instruction or guidance on basic landlord-tenant rights and responsibilities, understanding the requirements and prohibitions of a lease, and meeting minimum expectations for care of the housing unit.

Support Stabilization in Housing

- The project staff should work directly with the participant and landlord to resolve tenancy issues without threatening the participant's tenancy. The issue might be failure to pay rent, not properly maintaining the unit, or disturbing the quiet enjoyment of others. It also may include a landlord not meeting their obligations. The project should work quickly to identify a corrective course of action, and, without breaking a participant's confidentiality, keep the landlord and participant informed about the project's action to mitigate the situation.
- Case managers should encourage participants to build their relationship with their landlord directly. This might relate to repairs; an extension on a rent payment; or complaints, either against the participant or of the participant.
- Case managers help participants avoid evictions before they happen, and maintain a positive relationship with the landlord. This can be done by moving a participant into a different unit prior to eviction and possibly identifying a new tenant household for the landlord's unit.
- The project should have a written policy on how they will actively work to prevent eviction and state that, should an eviction occur, the participant is able to remain in the project and find a new rental unit to quickly secure housing again.
- Housing plans, sometimes known as case plans or goal plans, should focus on how project participants can maintain a lease and address barriers to housing retention, including maximizing their ability to pay rent; improving understanding of landlord/tenant rights and responsibilities; and addressing other issues that have, in the past, resulted in housing crisis or housing loss. Plans account for participant preferences/choices and include only goals created with and agreed to by the participant. These plans should identify strengths from previous instances of housing success and strive to replicate or build upon these strengths.
- The project should, at a minimum, maintain a list of community resources (and their eligibility requirements) to which participants can be referred. Preferably, the project has relationships with these agencies. The list should be regularly updated, and case managers should stay informed on availability and eligibility of these resources.
- Case managers should make referrals to appropriate community and mainstream resources, including, but not limited to income supplements/benefits (TANF, Food Stamps/SNAP, etc.), non-cash supports (healthcare, food supports, etc.), legal assistance, credit counseling, and subsidized child care. When making these referrals, it is the case manager's responsibility to follow-up on receipt of assistance. However, a participant may choose not to follow up on or participate in any referred services or programs.

- As rapid rehousing assistance is short-term, case managers should pay particular attention to participants' incomes moving forward. Though income is not a requirement at the beginning of a project, case managers' help participants review their budgets, including income and spending, to make decisions about reducing expenses and increasing income. Options include benefit enrollment and increasing employment and earnings over time. All income and budgeting conversations should be had using motivational interviewing techniques and with awareness of implicit biases.
- Case managers should work with participants to identify pathways for increasing earned income, including participating in mainstream and community employment support programs as well as using a project's own employer connections.
- If appropriate, participants should be assisted in identifying existing familial and personal connections that can help them maintain housing by providing supports such as child care, transportation, etc. Participants may choose not to engage in this process.

Close the Case (Project Exit)

- When closing a case, case managers are responsible for ensuring that all appropriate referrals have been made and information on available community assistance has been shared with a participant.
- When closing a case, case managers should provide information to participants about how they can access assistance from the project again if needed and what kind of follow-up assistance may be available. In instances when a participant is at imminent risk of returning to homelessness, the project has the capacity to either directly intervene or provide referral to another prevention resource.

Examples of Meeting Project Standards

Rapid rehousing case management and services that meet the above standards include those that:

- Have job descriptions for case managers that include requirements that they focus activities on obtaining housing and housing stabilization and conduct case management in participants' homes and other locations outside the office and that they have the ability to get to and from those meetings.
- Have case/housing plan templates that limit the number of goals and action steps to be included in a single plan and focus attention on housing and income related goals.
- Have a case review process to help staff problem-solve around case/housing plans.
- Make use of a "permanent supports map" that helps participants identify people already in their lives who can help with specific things, such as transportation or childcare.
- Offer budgeting assistance and referral when desired by participants.
- Train staff to coach participants in conflict avoidance or de-escalation, adequate care of the housing unit, lease compliance, etc.
- Collect, maintain, and update records of available mainstream and community resources for project participants. This includes community resources that can reduce burdens on income including employment opportunities or coaching agencies, food banks, clothing consignments store, low-income utility programs, and others.