

Texas Balance of State Continuum of Care

CoC General Meeting, April 9, 2019, 2:00 pm

Notes

CoC General Membership Attendees: See attached attendance list from the webinar

TX BoS CoC Staff in Attendance: Jen Beardsley, Kraig Blaize-Fiero, Tiffany Hart, Kyra Henderson, Antonio Kufof, Mollie Lund, Marissa Ortega, Mary Stahlke, Jim Ward, and Andrew Willard

Link to a recording of April General Meeting: <https://thn.adobeconnect.com/pgk15tgllt6o/>

I. Welcome and Introductions

Mary Stahlke, CoC Manager, welcomed attendees. Mary introduced THN staff (see attached document) by showing a document with staff photos, emails and phone numbers. Mary also thanked everyone who attended Homelessness Awareness Day on April 4th at the Capitol.

- 100 people joined THN at the capitol for Homelessness Awareness Day
- Individuals talked with state representatives about legislative priorities for both THN and homelessness statewide and for specific communities' priorities.

Kraig facilitated attendees' indicating on the Texas map where they were attending from.

II. Summary of Prior Meeting

Mary gave an overview of the last meeting and included the following main topics from the March general meeting.

- The main topic was emergency shelter and temporary housing.
 - There are 92 shelters across the TX BoS CoC
 - There are 3,682 beds available across the TX BoS CoC
 - 16% of households exit from non-low barrier shelters to permanent housing but 75% of households exit from low barrier shelters to permanent housing
- A panel on Emergency Shelters and Temporary Housing included conversation from providers in the CoC: Kim Ogilvie, Molly Voyles, Katherine Bisson, John Meier and Alexzandra Hust,
- Abilene was congratulated on ending veteran homelessness.

III. Data Snapshot

Kyra and Marissa presented the Data Snapshot on Racial Disparities: (see attached infographics) –

- The first graph showed race data reported in the Point-in-Time (PIT) Count over the past three years. The White race category is significantly larger in numbers than the other races. Note: Because Latino/Hispanic is considered an ethnicity instead of a race, individuals who select White as their race may select Latino/Hispanic as their ethnicity, so there could be a group of persons of color in the White race category who are experiencing homelessness.
- The number of individuals experiencing homelessness that identified as African American and those that identified as White are increasing, while the number of individuals identifying as American Indian, Asian, Native Hawaiian, and Multiple races categories are not only significantly smaller in numbers, but they are also decreasing. We encourage you to determine if there are ways your community can take a more intentional approach of locating and surveying individuals who identify as American Indian, Asian, Native Hawaiian, or Multiple because, according to the 2010 Census for Texas' general population, they should likely represent a larger portion of our homeless population breakdown.

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- Three ethnicity categories are Hispanic/Latino, Non-Hispanic/Latino, and Unknown. Unknown encompasses all of the surveys where an individual did not disclose their ethnicity, or it was a null value. The most important highlight is that the Unknown responses (shown in yellow) has shrunk by more than half. This means that since 2017 there has been a concerted effort by volunteers and PIT leaders to fill out the ethnicity information.
- The 2010 Census data and the 2019 PIT Count data can be compared. The Census data represents the full population of Texas, while the TX BoS CoC's PIT Count data represents only people represented in the surveys collected from the communities that participated in the PIT Count. According to this comparison: African Americans within the CoC are more than twice as likely to be represented in the homeless population as they are represented within the State's general population. This coincides with the findings that African Americans make up a larger proportion of the individuals involved in the homeless crisis response system than they make up of the proportion within the population for our state. This finding is a trend that is noted throughout the country.
- You can find the Racial Equity tool that HUD released for each CoC [here](#).
- For questions on the infographics and for help with creating infographics, email kyra@thn.org and marissa@thn.org.

IV. How We are Ending Homelessness—With Rapid Re-Housing (see attached slides)

Jim and Andrew presented information about RRH and led a community conversation about RRH.

Staff used input that attendees gave at the end of the March CoC General Meeting to develop the presentation.

The [National Alliance to End Homelessness \(NAEH\)](#) identifies three core components of RRH:

1. Housing Identification – locate, as quickly as possible, housing of their choice that meets basic needs, educating landlords, and supporting landlords and participants
2. Rent & Move-in Assistance – financial assistance, helping to pay first and second months' rent, working with people who do not have an income, and assisting with basic needs
3. Case Management & Other Services – assist participants to connect with community resources and assist with housing skills, budgeting and helping to increase income.

THN staff created a map showing RRH coverage across the CoC, including ESG, CoC and SSVF-funded projects (see attached map). There is also an interactive version of the map [here](#).

Jim compared CoC, ESG & SSVF-funded RRH.

If your project receives CoC Program funds for RRH, you must follow the CoC Written Standards for Service Delivery that can be found [here](#). ESG projects must follow ESG written standards, and SSVF projects are required to follow the Veterans Affairs' (VA's) rule on supportive services.

Progressive Engagement: the philosophy is to provide the minimum subsidy to each household in order for them to achieve maximum stability.

RRH projects are short-term crisis intervention, but case managers can assist participants to access formal supports such as SNAP, Medicaid, supportive employment, and income. Also, case managers can assist with informal supports such as family, friends, faith communities, and meaningful daily activity supports. Services should be guided by participants and the needs identified by participants.

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Rapid Re-housing is an integral part of the community's housing crisis response system (HCRS). RRH may be used for people who score in the RRH range on the VI-SPDAT triage tool used in Coordinated Entry. It may also be used to house people who score in the range for Permanent Supportive Housing (PSH), especially if a community does not have PSH units. RRH may also support lower-acuity participants, or those that score lower than the RRH range, rather than leaving them in a homeless situation, if RRH units are available.

Many communities receive Home Investment Partnership Program (HOME) funds, Community Service Block Grant (CSBG), and Department of Justice (DOJ) funds to serve victims, and all those funds can pay for RRH. Find out about federal resources that can fund RRH [here](#). (See handout)

Pre-test and post-test questions:

1. There is no significant difference between Continuum of Care (CoC) Program-funded RRH rental assistance and Emergency Solutions Grant (ESG) Program-funded RRH rental assistance. True or False?

Answer: False – there are some significant differences.

2. Studies have shown which rental assistance model yields fewer returns to homelessness and greater positive outcomes?
 - a. Progressive Engagement (amount of assistance is decided on participant need)
 - b. A fixed percentage of assistance (30% of participant income)
 - c. Tiered Assistance (100% first month, then 90%, then 80%, etc.)
 - d. Deep Subsidy (80% for 6 months)

Answer: a. Progressive Engagement

3. CoC Written Standards for Service Delivery apply to ESG Program-funded projects and Supportive Services for Veteran Families-funded (SSVF-funded) projects as well as CoC Program-funded projects. True or False?

Answer: False – The CoC Written Standards cannot be used as your ESG Written Standards; ESG projects must have ESG Written Standards. SSVF projects must follow the SSVF Program Guide. ESG and SSVF guidelines should align with the CoC Written Standards, but there are significant differences among the programs to be aware of.

Note that Coordinated Entry (CE) Written Standards apply to all ESG, SSVF and CoC Program-funded projects.

V. CoC Priority Projects

a. Homeless Management Information System (HMIS)

- i. Longitudinal System Analysis (LSA)
 1. Will be submitted on the 22nd of April to HUD
- ii. Universal Data Quality (UDQ) Reports
 1. Corrections requests were sent to HMIS administrators. Agencies need to submit changes by April 24th.
- iii. The HMIS and Data teams will be out of the office April 15-17 at the National Human Services Data Consortium conference to present a session and to learn

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about the latest best practices in HMIS and data. They will be responding to emails but may take longer than usual to respond.

b. Data

- i. Point In Time (PIT) Count
 - 1. Reports posted on THN's website at <https://www.thn.org/data/point-time-pit-count-reports/>
 - 2. Due to HUD the April 30th
- ii. Housing Inventory Count (HIC)
 - 1. Staff is working to get all data from communities by April 12th
 - 2. Due to HUD April 30th

c. Systems Change

- i. Built for Zero
- ii. Coordinated Entry Steering Committee
 - 1. The committee will guide the operation and refinement of Coordinated Entry in the BoS, John Meier is the chair of the CE Steering Committee.e
- iii. CE Unplugged
 - 1. The most recent call focused on training related to victim services providers. The Salvation Army of Temple and Families in Crisis in Killeen discussed the "domestic violence (DV) workaround" for CE and in HMIS for CE.
 - 2. The next call will be held on May 14th.

d. CoC Program

- i. Grant Inventory Worksheet (GIW) released
 - 1. Jim has emailed all currently-funded projects to review the GIW and submit any changes to him. Jim will submit the GIW to HUD April 18th.
- ii. CoC RRH Work Group will meet on April 18th. All CoC Program-funded RRH projects are invited to participate. Contact Andrew@thn.org for more information.
- iii. "So You Want to Receive CoC Program Funding" webinar on April 23 2019 Register [here](#)
 - 1. This webinar is an introduction to the CoC Program.
 - 2. If you are interested in applying for the CoC Program please attend both the 23rd and 30th webinar.
- iv. "New Project Applicants: Developing a Strong Project" webinar on April 30th Register [here](#)
 - 1. This webinar will focus on project design
 - 2. If you are interested in applying for the CoC Program please attend both webinars.
- v. Quarterly Performance Score Cards are due on April 30th.

e. ESG Program

- i. State ESG Notice of Funding Availability (NOFA) may be released soon. Please sign up for the TDHCA email list to stay informed. Sign up [here](#).

f. LHCs

- i. The LHC Chair conference call on Criminalization of Homelessness will be held on April 22nd. Panelists will talk about educating elected officials and the general public and a law enforcement perspective. Interested Chairs may email Jen at jen@thn.org
- ii. THN is asking LHCs to take 30 minutes of your April or May meeting to break into groups by expertise and answer survey questions that will be used in the application for CoC Program funds.

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g. Governance

- i. New [CoC Board members](#)—Jeramy Cannon and Kyle Moore
 - 1. Recently appointed Jeramy to Seat 1 representing persons with lived experience and recently appointed Kyle Moore Seat 12 representing law enforcement/criminal justice.
- ii. CoC Board Officers have been elected:
 - 1. Chair—Dani Shaw, City of Denton
 - 2. Vice Chair—Melissa Escamilla, Endeavors
 - 3. Secretary—Michelle Huff-Alexander, Journey to Wholeness

VI. Next Meeting

Wednesday, May 8th, at 2:00 pm, by webinar. Topic: Permanent Supportive Housing (PSH). Register [here](#).

Poll questions: How familiar are you with PSH? Which PSH topics would you like to know more about? Answers will be used to develop next month's materials.

Mary thanked attendees and staff. Mary said a feedback survey would be available to attendees when they exit the webinar; THN would appreciate attendees completing the survey to tell us what worked well and what could be changed for the next meeting.

CoC staff stayed on the webinar for 15 minutes more to answer questions from attendees.

The meeting ended at: 3:30 P.M.

April 2019 CoC General Meeting Attendance

<u>Name</u>	<u>Attendance Status</u>	<u>Company Name</u>
Adrienne Arthur	Attended	City of Longview Housing Authority
Alaina Marcum	Attended	Mission Texarkana
Alena Morgan	Attended	TDHCA
Alexzandra Hust	Attended	Abilene Hope Haven
Andrea Omojola	Attended	Open Door
Andrea Wilson	Attended	PATH
Annalesha Brannon	Attended	Families in Crisis
Anne Spanyers	Attended	Advocacy Outreach
Beth Rolingson	Attended	ADVOCACY OUTREACH
Carol Racz	Attended	Texana
carolyn martin	Attended	usvets
Cheteva Marshall	Attended	City of Longview
Christy Plemons	Attended	The Salvation Army
Courtney Cross	Attended	United Way of Denton County, Inc.
Daisy Lopez	Attended	Friendship of Women Inc.
Damian Clark	Attended	Advocacy Outreach
Daphne' Adams	Attended	Christian Community Action
Deanna Lowrey-Green	Attended	Combined Community Action
Debra Arsuaga	Attended	Corpus Christi Hope House
Debra Huffman	Attended	Neighborhood Development Corp
DEBRA WASHINGTON	Attended	THE CHILDREN'S CENTER, INC.
DeJernel Adams	Attended	TAN Healthcare
Erika Thomas	Attended	Odessa Links
Felicia Holland	Attended	The Salvation Army
Irma Garza	Attended	Hidalgo County Urban County Program
Jessica McMurray	Attended	Families In Crisis
John Meier	Attended	WCTRF
Jordan McCarty	Attended	Denton County MHMR
Juana Wright	Attended	Families In Crisis
Julia Lash	Attended	City of Brownsville
Karah Witzsche	Attended	Nueces Center for Mental Health and Intellectual Disabilities
Kemberley Calk	Attended	Golden Crescent Regional Planning Commission
Kyle Knutson	Attended	The Salvation Army
Marsha Wilson Rappaport	Attended	The Children's Center
Mary Jones	Attended	Denton County homeless coalition
Mary Perez	Attended	City Brownsville
Melissa Escamilla	Attended	ENDEAVORS
Melissa Rawlins	Attended	CHAYAH
Michaelle Wormly	Attended	Women Opting for More Affordable Housing Now, Inc. (WOMAN, Inc.)
Michelle Johnston	Attended	Families In Crisis Inc.

April 2019 CoC General Meeting Attendance

Michelle Yates	Attended	La Posada
Monica Pena Rasmussen	Attended	La Posada
Natalie Metzger-Smit	Attended	Footprint Consulting
Nathaniel Dears	Attended	Denton County MHMR Center
Norma Longoria	Attended	Family Crisis Center
Penny Hniguira	Attended	The Salvation Army
Rachel Dean	Attended	Families in Crisis, Inc.
Rayleen Bingham	Attended	TCOG
Rebecca Bromley	Attended	Neghborhood Development Corp.
Rebecca Ramirez	Attended	Families in Crisis, Inc
Reverend Edward Lawson	Attended	The Chosen Ones Outreach Ministries of Galveston,
sabrina Lang	Attended	Community Healthcore
Samuel Anzaldau	Attended	Brownsville Literacy center
Shelly Braziel	Attended	Lchc
Sherry Murphy	Attended	Family Crisis Center
Stephanie Jerez-Rodriguez	Attended	Giving HOPE
Taylor Cameron	Attended	Denton County Friends of the Family
Tiffany Ross	Attended	Community Action Committee of Victoria, Texas
Tommy Lee Martinez	Attended	Loaves & Fishes of the RGV, Inc.
Tracy Andrus	Attended	Tracy Andrus Foundation
Vicki Smith	Attended	Community Action Committee of Victoria, Texas
Zee Carroll	Attended	City of Texarkana, Texas

TX BoS CoC General Meeting

Agenda
April 10, 2019, 2:00 p.m.

Lobby poll:

Did you leave the March CoC General Meeting with any questions about emergency shelter? If so, click [here](#).

- I. Welcome, Introductions and Map of Attendees**
- II. Summary of prior meeting**
- III. Data Snapshot, Racial Disparities**
- IV. How We are Ending Homelessness – With Rapid Re-Housing**
- V. Community Conversation – Rapid Re-Housing**
- IV. CoC Priority Projects**
 - a. Homeless Management Information System (HMIS)
 - i. Longitudinal System Analysis (LSA)
 - ii. Universal Data Quality (UDQ) Reports
 - b. Data
 - i. Point In Time (PIT) Count
 - ii. Housing Inventory Count (HIC)
 - c. Systems Change
 - i. Built for Zero
 - ii. Coordinated Entry Steering Committee
 - iii. CE Unplugged
 - d. CoC Program
 - i. Grant Inventory Worksheet (GIW) released
 - ii. CoC RRH Work Group meeting on April 18th
 - iii. "So You Want to Receive CoC Program Funding" webinar on April 23rd: Register [here](#)
 - iv. "New Project Applicants: Developing a Strong Project" webinar on April 30th: Register [here](#)
 - v. Quarterly Performance Score Card due April 30th
 - e. ESG Program
 - i. State ESG NOFA may be released soon

TX BoS CoC General Meeting

- f. LHCs
 - i. Call for questions: LHC Chair Conference Call on Homelessness Criminalization
 - ii. Preparation for the CoC Program grant competition
- g. Governance
 - i. New [CoC Board members](#)—Jeremy Cannon and Kyle Moore
 - ii. Board officers
 - 1. Chair—Dani Shaw
 - 2. Vice Chair—Melissa Escamilla
 - 3. Secretary—Michelle Huff-Alexander

V. Next Meeting – Wednesday, May 8th, at 2:00, by webinar. Topic: Permanent Supportive Housing (PSH). Register [here](#).

Poll: What is your familiarity with PSH? Which PSH topics would you like to know more about?

Staff will be available on the webinar for 15 minutes after the meeting ends, for an open discussion on topics that attendees want to discuss.

Give your feedback!

Please complete the anonymous survey you will receive after the meeting ends, to let us know what was helpful and what would could be better for the next meeting.

Become a CoC Member!

Anyone who works or lives in the CoC's geographic area, and all housing and homeless services projects in the CoC's geographic area, are considered to be members of the CoC. The CoC has an open invitation process, so members may join at any time.

THN invites members to participate in the CoC's activities. Learn more on the [email list](#), the [website](#), and [social media](#).

CoC General Meetings include presentations by and conversations between CoC members and staff on topics that are important to preventing and ending homelessness. See the [schedule](#) for dates, topics, and registration links. Meeting notes and recordings are posted on THN's website at <https://www.thn.org/texas-balance-state-continuum-care/get-involved/>.



Jen Beardsley
TX BoS CoC Coordination &
Engagement VISTA
512-861-2154 | jen@thn.org



Tiffany Hart
System Change Coordinator
512-861-2129 | tiffany@thn.org



Victoria Lopez
System Program Coordinator
512-861-2115 | victoria@thn.org



Mary Stahlke
CoC Program Manager
512-861-2180 | mary@thn.org



Kraig Blaize-Fiero
CoC Programs Assistant
512-861-2193 | kraig@thn.org



Kyra Henderson
Data Coordinator
512-861-2192 | kyra@thn.org



Mollie Lund
ESG & SSVF Performance Coordinator
512-861-2119 | mollie@thn.org



Jim Ward
Assistant Director of Planning
512-861-2165 | jim@thn.org



Sophia Checa
Director of CoC Programs
512-861-6286 | sophia@thn.org



Antonio Kufoy
HMIS Data Specialist
512-910-8740 | antonio@thn.org



Elena Lusk
Coordinated Entry VISTA
512-828-3412 | elena@thn.org



Andrew Willard
CoC Performance Coordinator
512-596-3320 | andrew@thn.org



Matthew Devine
HMIS Support Specialist
512-861-2181 | matthew@thn.org



Lindsay LaGrange
Training Coordinator
512-861-2155 | lindsay@thn.org

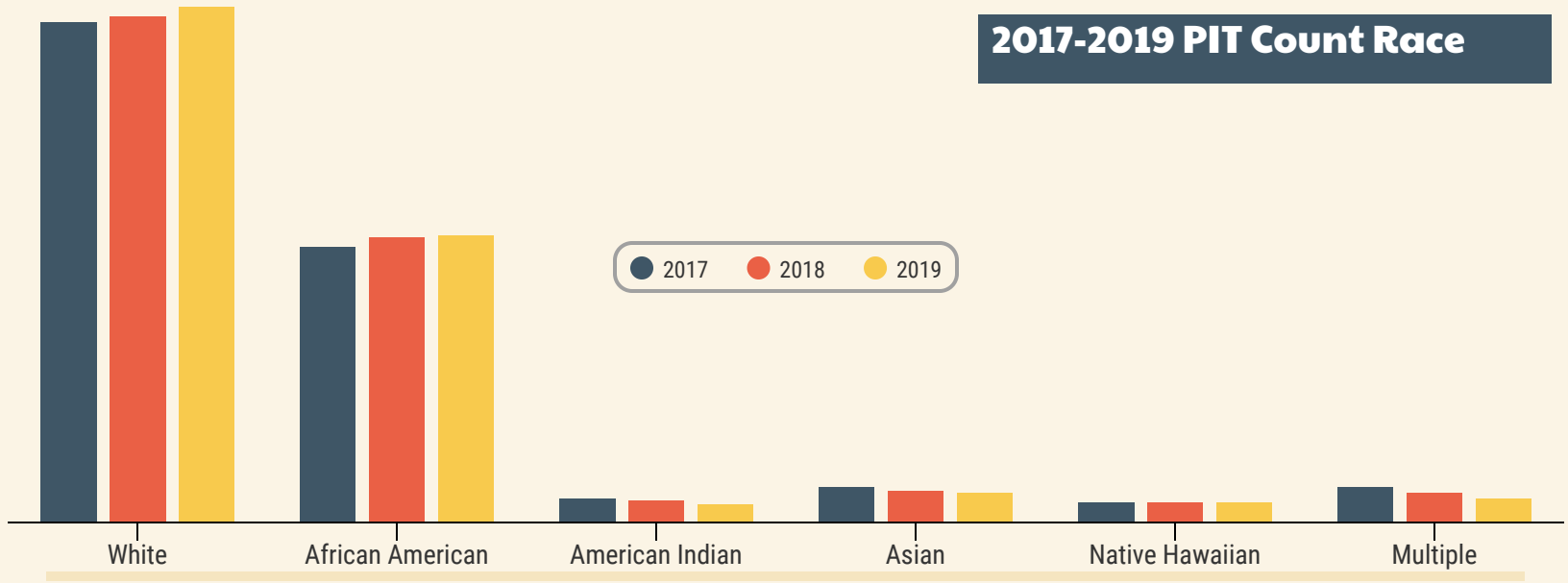


Marissa Ortega
Data VISTA
512-861-2154 | marissa@thn.org

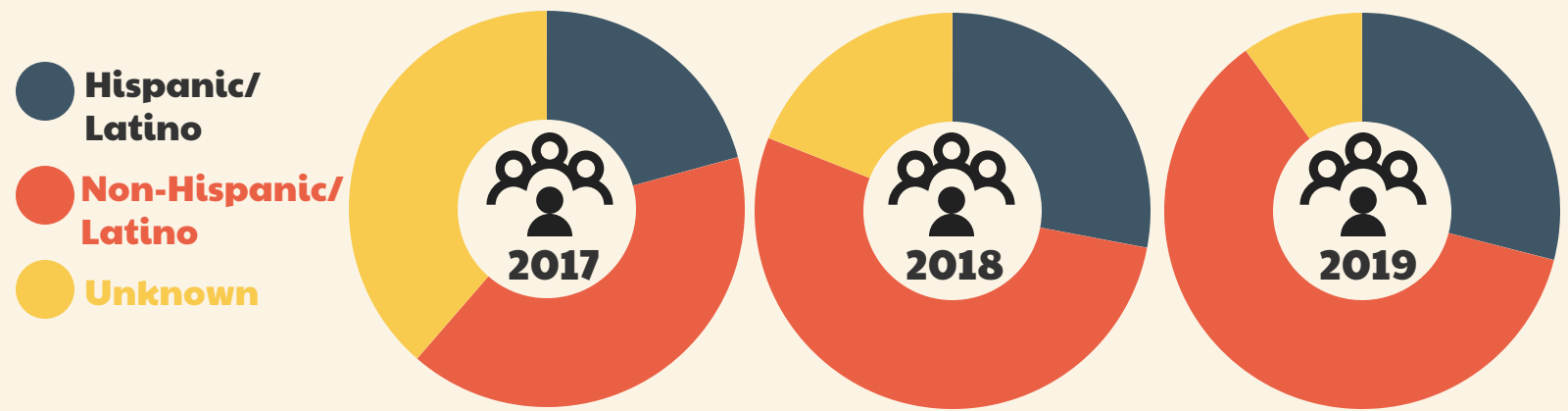


Kristin Zakoor
Assistant Director of Data
512-354-2033 | kristin@thn.org

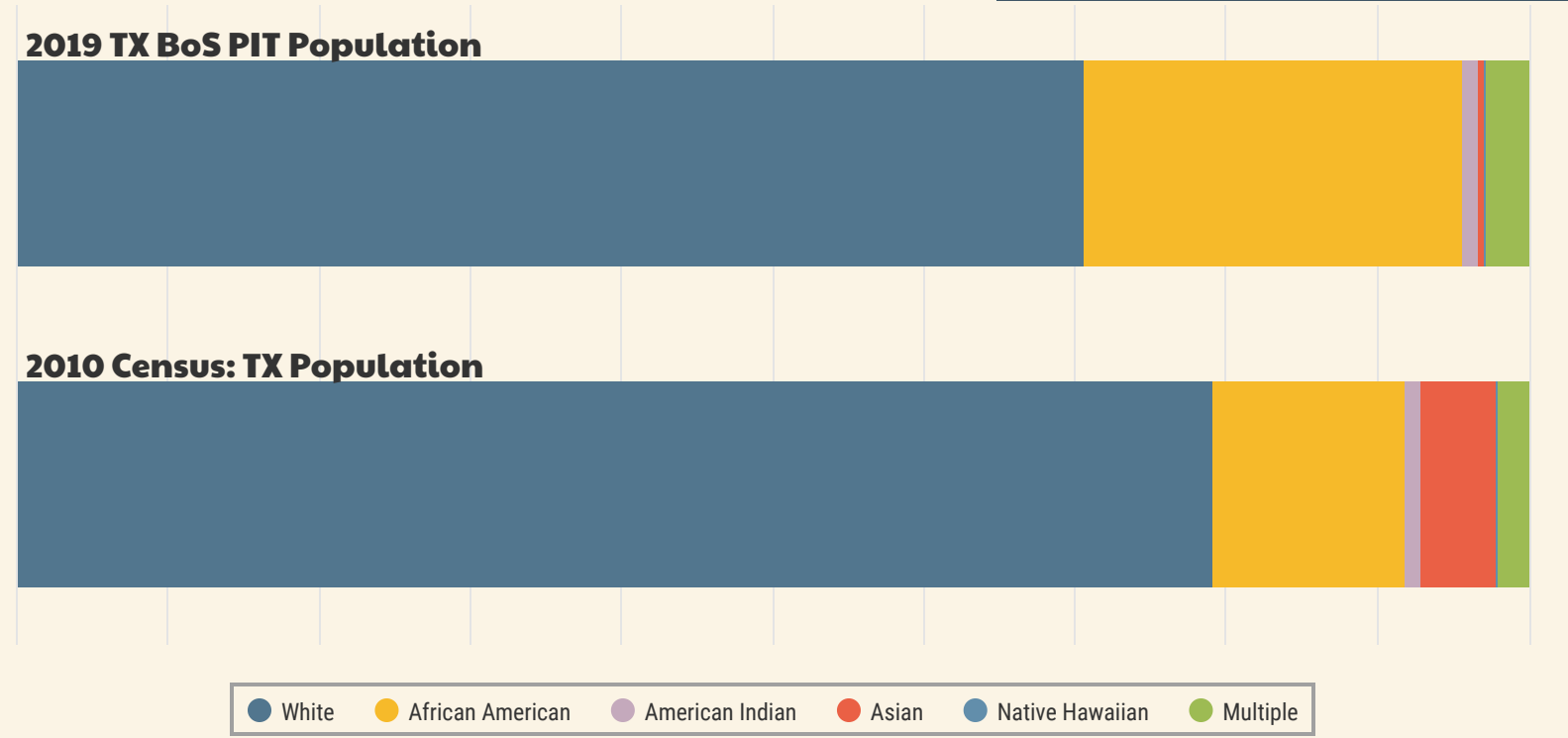
2017-2019 PIT Count Race

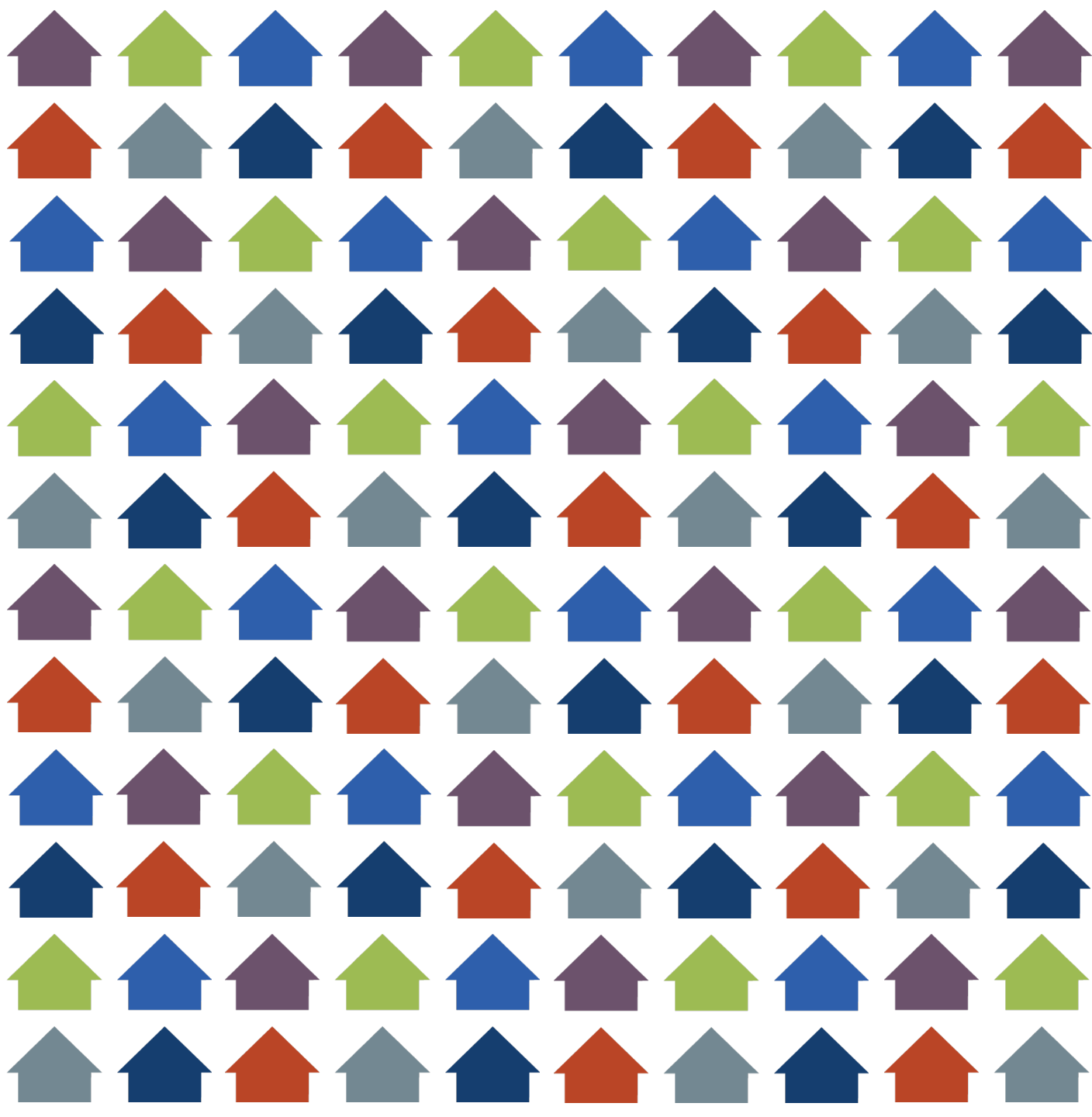


2017-2019 PIT Count Ethnicity



Census Vs. 2019 PIT





Rapid Re-Housing

Strategies For Change

thn.org

A brief overview; What is Rapid Re-Housing? (RRH)

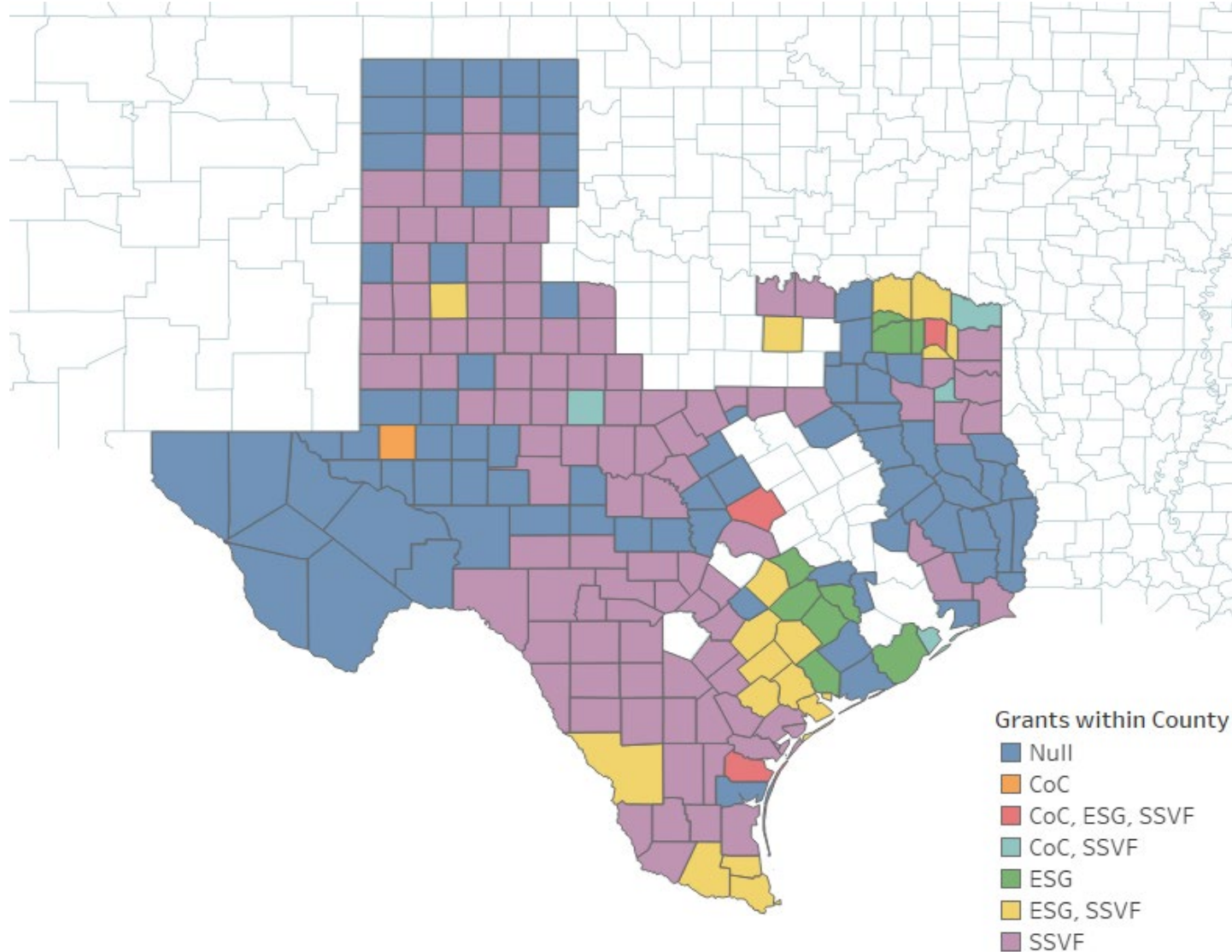
RRH Projects must have three core components:

1. Housing Identification
 - Help participants locate housing options quickly (<30 Days)
 - Landlord Outreach and retention
2. Rent and Move-in Assistance
 - Provide subsidies to assist participants to assume full financial authority of their housing cost
 - Assist with furniture and basic housing needs
3. RRH Case Management and Services
 - Assist participants to connect to other community resources
 - Assist participants with housing skills, budgeting, and increasing income



Texas Balance of State CoC

CoC, ESG & SSVF RRH Coverage



[Click here for the Tableau Public Interactive Version of this map!](#)

Common RRH programs in the TX BoS CoC

CoC, ESG & SSVF Rapid Re-Housing Basics		
<i>Continuum of Care (CoC)</i>	<i>Emergency Solutions Grant (ESG)</i>	<i>Supportive Services for Veteran Families (SSVF)</i>
<p>Eligible Clients:</p> <ul style="list-style-type: none"><i>Literally Homeless (Categories 1 & 4)</i><i>Fleeing/attempting to flee DV</i> <p>RRH Income Eligibility at Entry:</p> <ul style="list-style-type: none">None <p>Length of RRH:</p> <ul style="list-style-type: none"><i>Up to 24 months</i> <p>Re-evaluation:</p> <ul style="list-style-type: none"><i>Required every 3 months based on need</i>	<p>Eligible Clients:</p> <ul style="list-style-type: none"><i>Literally Homeless</i><i>Fleeing/Attempting to flee domestic violence, and are also literally homeless</i> <p>RRH Income Eligibility at Entry:</p> <ul style="list-style-type: none">None <p>Length of RRH:</p> <ul style="list-style-type: none"><i>Up to 24 months in a 36 month period</i> <p>Re-evaluation:</p> <ul style="list-style-type: none"><i>Required Annually based on need & income evaluation</i>	<p>Eligible Clients:</p> <ul style="list-style-type: none"><i>Literally Homeless Veteran Household</i><i>Fleeing/Attempting to flee domestic violence</i> <p>RRH Income Eligibility at Entry:</p> <ul style="list-style-type: none">Gross annual income that does not exceed 50 percent of AMI. <p>Length of RRH:</p> <ul style="list-style-type: none"><i>Up to 10 months in 24 month period with no Rental assistance for more than 6 months in any 12 month period.</i><i><u>Extremely Low Income Veteran Families</u> not to exceed 9 months in any 12 month period or 12 months in a 2 year period.</i> <p>Re-evaluation:</p> <ul style="list-style-type: none"><i>Required Every 3 months: based on need & income evaluation</i>



RRH with Progressive Engagement

- Philosophy: Provide the minimum subsidy to each household in order for them to achieve maximum stability guided by their unique needs and situations
- Requires participant centered conversations about
 - what assistance they need to achieve stability
 - belief they can achieve stability
 - ability to change project funded rental assistance each month
- What isn't Rapid Re-Housing guided by progressive engagement:
 - Declining Subsidy Model: Month 1 program pays 100%, Month 2 95%, Month 3 80%
 - Deep Subsidy Model: Household Pays fixed percentage of income towards rent (Household pays 30% of income)
 - Fixed Subsidy Model: All 1 bedroom units receive \$500/monthly subsidy, 2 bedroom \$1,000 monthly subsidy



Decreasing Assistance and Exit Planning

No longer needs assistance

- Participants have moved to successfully paying 100% of household rent
- Conversations should occur 30-60 days before final subsidy
- Celebration

No Program Engagement

- Outreach workers
- About 90 days
- Home visits
- Wellness checks
- Talk with landlord
- Do you make payments on units if you don't know where the participant is?

Program Rule Violation

- Avoid terminating participants whenever possible
- Life threatening rule violations or providing fraudulent eligibility information are clear grounds for termination
- Clearly communicate expectations at project entry
- Provided grievance and appeal policy at termination

Bridging and Timing out

- Bridging
- Avoid exiting participants back to homelessness whenever possible
- Family Unification
- Mutual Rescission
- Reevaluate income-increasing options



Importance of Connecting Participants to Mainstream Benefits

- Rapid Re-Housing Projects alone cannot address systemic poverty or longer term housing instability
- Rapid Re-Housing is a short-term crisis intervention. As such, the intent of Rapid Re-Housing case management is not to build a long-term service relationship but instead to assist a household in accessing and stabilizing in a housing unit
- Rapid Re-Housing case managers assist participants with connecting to both formal (SNAP, Medicaid, supportive employment, income) and informal (family, friends, faith communities, meaningful daily activities) supports
- Services should be guided by participants and the needs identified by participants. Case managers should help to differentiate between short-term stability goals and long-term goals that would be better provided by other community partners



RRH and Meeting Community Need

- Rapid Re-Housing as a integral part of the community's Housing Crisis Response System (HCRS)
- Supporting special populations
- Data-driven decision-making and Data Quality
- Rapid Re-Housing supporting PSH-level clients (dynamic prioritization)
- Rapid Re-Housing supporting low-acuity participants
- Are Rapid Re-Housing resources available to the community or just Agency/Project participants?



Questions and Concerns

- Feel free to type your questions into the chat box
- If you feel uncomfortable asking a question, you can chat a presenter directly
- If you are a CoC Program-funded RRH Provider, you can join us on our monthly Workgroup webinar



CoC, ESG & SSVF Rapid Re-Housing Basics		
<i>Continuum of Care (CoC)</i>	<i>Emergency Solutions Grant (ESG)</i>	<i>Supportive Services for Veteran Families (SSVF)</i>
Eligible Clients: → Literally Homeless (Categories 1 & 4) → Fleeing/attempting to flee DV RRH Income Eligibility at Entry: → None	Eligible Clients: → Literally Homeless → Fleeing/Attempting to flee domestic violence, but are also literally homeless RRH Income Eligibility at Entry: → None	Eligible Clients: → Literally Homeless Veteran Household → Fleeing/Attempting to flee domestic violence RRH Income Eligibility at Entry: → Gross annual income that does not exceed 50 percent of AMI
Length of RRH: → Up to 24 months	Length of RRH: → Up to 24 months in a 36 month period	Length of RRH: → Up to 10 months in 24 month period with no Rental assistance for more than 6 months in any 12 month period. → Extremely Low Income Veteran Families not to exceed 9 months in any 12 month period or 12 months in a 2 year period
Re-evaluation: → Required every 3 months based on need	Re-evaluation: → Required Annually based on need & income evaluation	Re-evaluation: → Required Every 3 months: based on need & income evaluation

Participant Eligibility Criterion for CoC, ESG & SSVF Rapid Re-Housing Programs						
Criterion	Initial Evaluation			Re-Evaluation		
	CoC RRH	ESG RRH	SSVF RRH	CoC RRH	ESG RRH	SSVF RRH
Homeless Eligibility						✓
Literally homeless	✓	✓	✓			
Fleeing/attempting to flee domestic violence	✓	✓*	✓			
Income Evaluation Required			✓		✓	✓
Lacking Resources and Support Networks				✓	✓	✓
A "member" of a Veteran family			✓			✓
✓* Eligible only if also literally homeless	✓* Eligible only if also literally homeless					

2013

Rapid Re-Housing: ESG vs CoC



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RAPID RE-HOUSING UNDER THE EMERGENCY SOLUTIONS GRANTS PROGRAM VERSUS THE CONTINUUM OF CARE PROGRAM

SIMILARITIES AND DIFFERENCES

Rapid re-housing (RRH) assistance aims to help individuals or families who are homeless move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services.

Communities have demonstrated and research has shown that RRH is a valuable strategy for quickly transitioning such individuals and families directly from shelter into permanent housing with needed and appropriate supports. To sustain RRH as a valuable community tool for ending homelessness, the Emergency Solutions Grants (ESG) program and the Continuum of Care (CoC) program both include rapid re-housing as an eligible form of assistance.

For administrative ease and when possible, HUD developed consistent eligible costs and program requirements for rapid re-housing for the two programs. However, some significant differences remain in the eligible costs and requirements for RRH activities administered under the ESG and CoC programs. This guidance document summarizes the significant similarities and differences between RRH assistance under the CoC program versus under the ESG program.

For more information, readers should also refer to materials on the [OneCPD Resource Exchange](#), such as the webinar on [Determining and Documenting Homeless and At Risk Status, Income, and Disability](#).

1. ELIGIBLE POPULATION

1.1 Determining Eligibility

ESG and CoC recipients and subrecipients must develop policies and procedures for identifying which families and individuals will receive RRH assistance. Using the centralized or coordinated assessment system, CoC and ESG recipients and subrecipients must conduct an initial evaluation of each individual or family seeking RRH assistance in order to determine:

- **Eligibility.** The eligibility of each individual or family seeking CoC or ESG assistance based on the individual's or family's living situation; and
- **Need.** The amount and type of assistance needed for the individual or family to (re)gain stability in permanent housing.

Eligibility

One of the major differences between RRH assistance under the ESG program and the CoC program centers on eligibility. To receive **ESG rapid re-housing (ESG-RRH)** assistance, an individual or family must demonstrate at initial evaluation that it is literally homeless (referred to as Category 1 in the [Homeless Definition Final Rule](#)). An individual or family is defined as "literally homeless" if (1) living in a public or private place not meant for human habitation, (2) living in temporary shelter, which includes congregate shelters and transitional housing, or (3) exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution.

RRH assistance is also available to people fleeing or attempting to flee domestic violence if they are **also** literally homeless (24 CFR part 576.104).

To receive **CoC rapid re-housing (CoC-RRH)** assistance, though, individuals and families may be defined as homeless under any of the four categories included in the Homeless Definition Final Rule:

- Literally homeless (Category 1).
- Imminently losing their primary night-time residence (Category 2).
- Unaccompanied youth under 25 years of age or families with children and youth who do not otherwise qualify as homeless under this definition but who are defined as homeless under another Federal statute and meet additional specified criteria (Category 3). **Note:** *For CoC-RRH assistance to be provided to persons defined as homeless under Category 3, the project must be located within the geographic area of a CoC that has received HUD approval to serve this population.*
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (Category 4).

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

Need and Continued Eligibility

ESG and CoC recipients and subrecipients must conduct regular re-evaluations, **at least annually**, of program participants receiving RRH assistance.

To **continue** to receive ESG- and CoC-RRH assistance, a program participant's re-evaluation must demonstrate eligibility based on:

- **Lack of resources and support networks.** The program participant's household must continue to lack sufficient resources and support networks to retain housing without ESG or CoC program assistance.
- **Need.** The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing.

In addition, an ESG-RRH re-evaluation must demonstrate:

- **Income.** The program participant household's annual income must **be less than or equal to** 30 percent of Area Median Income (AMI).

The CoC Program interim rule does not establish an income eligibility guideline for continued RRH assistance. However, as part of its **written standards**, a Continuum of Care may establish an income requirement for continued eligibility in order to align—to the extent possible—its RRH assistance with ESG assistance provided within the CoC's geographic area. In addition, an ESG recipient may, in developing its written standards, set a more restrictive income eligibility standard. That is, the HUD eligibility standard defines the upper bound of eligibility, which the CoC and/or the ESG recipient may narrow further as part of its effort to target limited resources.

Exhibit 1 summarizes the differences between the criteria that apply at initial evaluation and at subsequent re-evaluations.

Exhibit 1: Eligibility Criteria Summary for ESG and CoC Rapid Re-Housing					
Criterion	Initial Evaluation			Re-Evaluation	
	ESG-RRH	CoC-RRH		ESG-RRH	CoC-RRH
Homeless Eligibility					
Literally homeless	✓	✓			
Imminent risk of homelessness		✓			
Homeless under other Federal statutes		✓			
Fleeing/attempting to flee domestic violence	✓*	✓			
Income Evaluation Required				✓	
Need (amount and type of assistance)	✓	✓		✓	✓
Lacking Resources and Support Networks				✓	✓
* <i>Eligible only if also literally homeless.</i>					

The reader should refer to the webinar on [Determining and Documenting Homeless and At-Risk Status, Income, and Disability](#) for more detail on how to determine and document housing status for RRH assistance.

2. ELIGIBLE USE OF FUNDS

ESG and CoC rapid re-housing grant funds may be used to provide short- and/or medium-term rental assistance and accompanying, limited supportive services, as needed, to help an individual or family that is homeless move as quickly as possible into permanent housing and achieve stability in that housing. Exhibit 2 provides a summary of eligible costs under ESG-RRH and CoC-RRH.

Exhibit 2: Eligible Costs Summary		
	ESG-RRH	CoC-RRH
Rental Assistance	<ul style="list-style-type: none"> • Short-term rental assistance (up to 3 months) • Medium-term rental assistance (4 to 24 months) • Rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears) 	<ul style="list-style-type: none"> • Short-term rental assistance (up to 3 months) • Medium-term rental assistance (4 to 24 months)
Rental Assistance Type	<ul style="list-style-type: none"> • Tenant-based rental assistance • Project-based rental assistance 	<ul style="list-style-type: none"> • Tenant-based rental assistance only
Eligible Costs	<p>Housing Relocation and Stabilization Services</p> <p>Financial assistance costs</p> <ul style="list-style-type: none"> • Rental application fees • Security deposits (up to 2 months) • Last month's rent • Utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears) • Moving costs <p>Service costs</p> <ul style="list-style-type: none"> • Housing search and placement • Housing stability case management • Mediation • Legal services • Credit repair 	<p>Financial assistance (eligible under rental assistance)</p> <ul style="list-style-type: none"> • Security deposits (up to 2 months) • First and last month's rent • Property damage <p>Supportive services</p> <ul style="list-style-type: none"> • Case management • Child care • Education services • Employment assistance and job training • Food • Housing search and counseling services, including mediation, credit repair, and payment of rental application fee • Legal services • Life skills training • Mental health services • Moving costs • Outpatient health services • Outreach services • Substance abuse treatment services • Transportation • Utility deposits

2.1 Rental Assistance

Both the ESG and CoC programs offer short- and medium-term rental assistance. ESG- RRH also may be used for payment of an eligible program participant's rent in arrears. However, CoC- RRH assistance may not be used for payment of rent in arrears.

In addition, ESG and CoC recipients and subrecipients may tailor their RRH rental assistance programs by specifying in their respective written standards:

- The maximum amount or percentage of rental assistance that a program participant may receive
- The maximum number of months that a program participant may receive rental assistance
- The maximum number of times that a program participant may receive rental assistance
- The extent to which a program participant must share the cost of rent

2.2 Eligible Type(s) of Rental Assistance

ESG-RRH rental assistance may be either tenant-based or project-based, but CoC-RRH rental assistance may only be tenant-based.

Tenant-based rental assistance (TBRA) enables program participants to locate housing of their choice in the private rental market. If a program participant later moves to another suitable unit, he or she may apply the rental assistance to the new unit. Even with the TBRA model, ESG and CoC recipients and subrecipients may require program participants to live within a particular geographic area or in a specific structure for the first year and in a specific area for the remainder of their period of participation (*24 CFR part 578.51(c)*).

Under both ESG and CoC, TBRA is subject to additional requirements, including quality of the unit (housing standards), rent reasonableness, documentation (e.g., lease, sublease), and written standards adopted by the recipient and subrecipient.

Project-based rental assistance (PBRA) is paid on behalf of an eligible program participant who moves into and leases a housing unit covered by a pre-existing rental assistance agreement between the owner of the unit and the recipient or subrecipient. Rental units covered by such agreements must be occupied and leased only by eligible ESG-RRH program participants.

Exhibit 3 summarizes RRH rental assistance activities and standards under the ESG and CoC programs.

Exhibit 3: Rental Assistance Overview		
	ESG-RRH Rental Assistance (24 CFR part 576.104)	CoC-RRH Rental Assistance (24 CFR part 578.37(a)(1)(ii))
Housing Standards	Units must pass HUD Habitability Standards	Units must meet HUD Housing Quality Standards
Fair Market Rent (FMR)	Rental assistance may cover up to the FMR for a unit	Rent reasonableness is the applicable rent standard
Rent Reasonableness	Units must comply with HUD's rent reasonableness standards	Units in a structure must comply with HUD's rent reasonableness standards

Exhibit 3: Rental Assistance Overview		
	ESG-RRH Rental Assistance (24 CFR part 576.104)	CoC-RRH Rental Assistance (24 CFR part 578.37(a)(1)(ii))
Lease Requirements	<ul style="list-style-type: none"> • A written lease between the owner and the program participant is required for TBRA and PBRA. • For program participants living in housing with PBRA, the lease must have an initial term of one year. There is no minimum lease period for TBRA. • The only exception to the written lease requirement is in the case of rental assistance provided solely for rental arrears. 	Program participants receiving TBRA must sign a lease of at least one year that is renewable (for a minimum term of one month) and terminable only for cause.
Written Standards	<p>Recipients and subrecipients must develop and implement written policies and procedures for:</p> <ul style="list-style-type: none"> • Determining and prioritizing which eligible families and individuals will receive RRH assistance • Determining the amount or percentage of rent and utilities each program participant must pay • 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 	<p>Recipients and subrecipients must establish and consistently follow policies and procedures established for:</p> <ul style="list-style-type: none"> • Determining and prioritizing which eligible families and individuals will receive RRH assistance • Determining the amount or percentage of rent each program participant must pay • Determining the maximum amount or percentage of rental assistance that a program participant may receive • Determining the maximum number of months that a program participant may receive rental assistance • Determining the maximum number of times that a program participant may receive rental assistance • Determining the extent to which a program participant must share the cost of rent

2.3 Services

In addition to rental assistance, rapid re-housing funds may be used to provide supportive services (CoC) and housing relocation and stabilization services (ESG) that address the specific needs of program participants and that are essential for assisting program participants in obtaining and maintaining housing.

The scope of services available to RRH program participants is more limited under the ESG program than under the CoC program, but both programs share some eligible service costs. Exhibit 4 provides an overview of each program's supportive services requirements.

Exhibit 4: Supportive Services Overview		
	ESG-RRH	CoC-RRH
Services	Supportive services are limited to housing relocation and stabilization services.	Supportive services include a wide range of services outlined in 24 CFR part 578.53.
Limit on Service Provision	Housing stability case management assistance may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the program participant is living in permanent housing.	Supportive services may be provided until 6 months after rental assistance stops.
Case Management Requirement	At a minimum, program participants must attend monthly case management meetings.	At a minimum, program participants must attend monthly case management meetings.

Exhibit 5 provides a summary of eligible supportive services under ESG-RRH and CoC-RRH. While CoC funding may be used to fund all CoC supportive services listed in 24 CFR part 578.53, the CoC may develop written policies and procedures that limit the services available to program participants in order to align CoC-funded RRH programs with ESG-funded RRH programs.

Exhibit 5: Summary of Eligible RRH Supportive Services		
	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 fees
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)

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.</p> <p>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 Deposits	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		

HOUSED PEOPLE ARE NOT HOMELESS

Rapid Re-Housing (RRH)
ends homelessness for
families and individuals.

RRH HELPS



FIND HOUSING

Help people quickly find housing
within one month or less.

PAY FOR HOUSING

Help people pay for housing short
term; longer-term help an option.

STAY IN HOUSING

Help access services so
people can stay in housing.

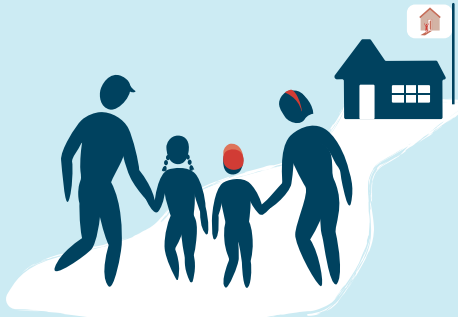
The **Core Components** of Rapid Re-Housing help people
find housing fast, **pay** for housing, and **stay** in housing.



FIND FAST HOUSING IDENTIFICATION



Build relationships with
landlords to have access to as
many housing units as possible.



Find and secure housing as
quickly as possible after a person
or family becomes homeless.



Limit the time a family or individual
spends homeless. Move people
into housing within **30 days or less**.



HELP PAY RENT AND MOVE-IN ASSISTANCE



Pay for security deposits,
move-in expenses...



... and/or rent and utilities.



Length of assistance varies,
but often **4 to 6 months**.



HELP STAY RAPID RE-HOUSING CASE MANAGEMENT AND SERVICES

Connect families and
individuals to services and
supports in the community.

Help resolve issues that may
threaten housing stability,
including conflicts with
landlords.



www.rapidre-housing.org

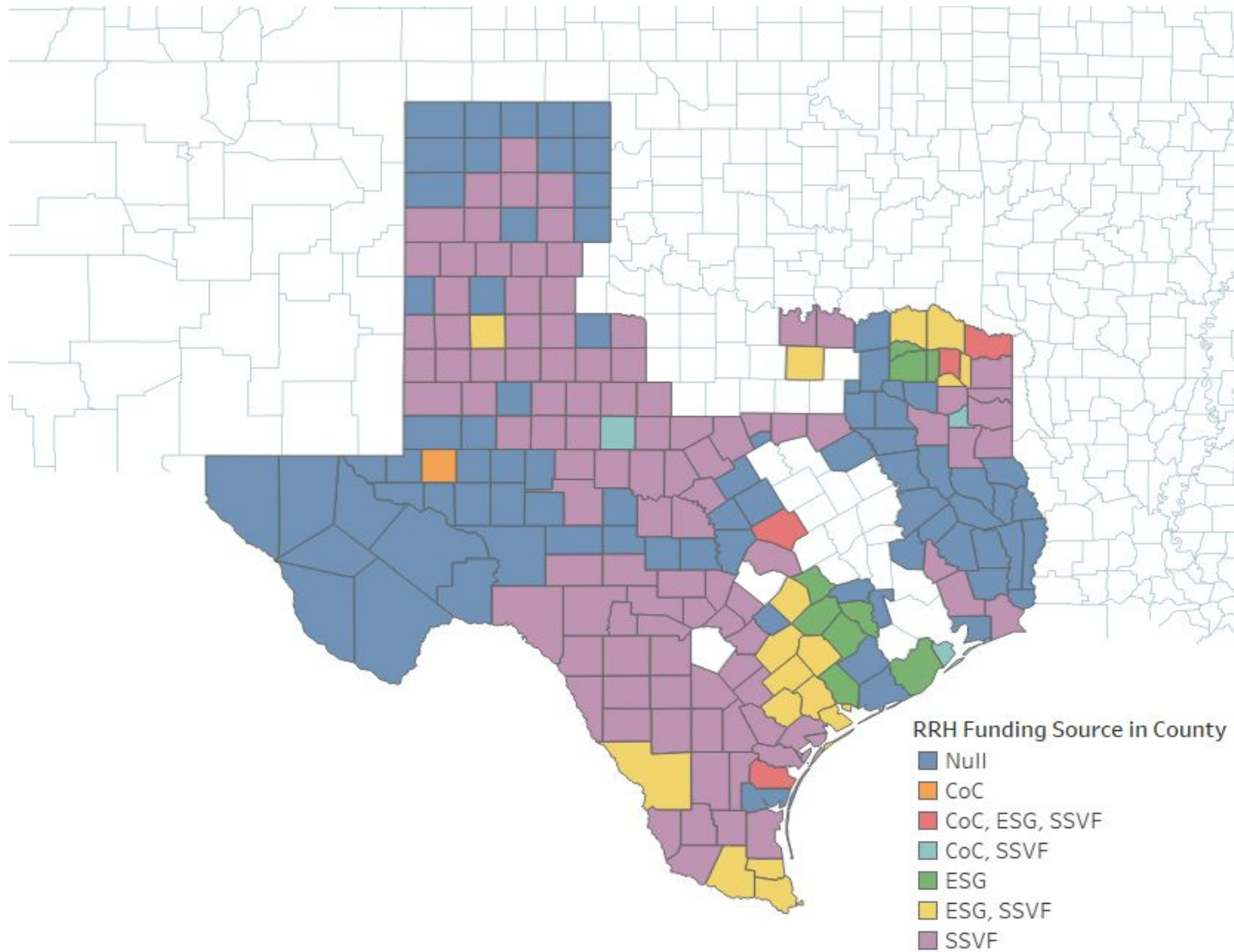


National Alliance to
END HOMELESSNESS

This document was produced by the National Alliance to End Homelessness with the support of the Melville Charitable Trust as part of an effort to increase the use of effective rapid re-housing practices nationwide. The National Alliance to End Homelessness is a leading national voice on the issue of homelessness that accomplishes its mission through research and education, policy analysis and advocacy, and capacity building. The Melville Charitable Trust is the largest foundation in the U.S. that is exclusively devoted to supporting solutions to prevent and end homelessness.

Texas Balance of State CoC

CoC, ESG & SSVF RRH Coverage



[Click here for an interactive version of this map!](#)