MARCH 1, 2021

RAPID REHOUSING SYSTEM-WIDE OPERATING STANDARDS OF PRACTICE

SAN DIEGO CONTINUUM OF CARE REGION

REGIONAL TASK FORCE ON THE HOMELESS

This page intentionally left blank

TABLE OF CONTENTS

SECTION I: INTRODUCTION + OVERVIEW

Rapid Rehousing (RRH) is a person-centered intervention designed to help individuals and families quickly exit homelessness and obtain/maintain permanent housing in the community and remain stably housed. It is a Housing First intervention which is offered without preconditions (such as employment, income, absence of criminal record, or sobriety). The program provides rental assistance and support that is tailored to the unique needs of each participant.

Rapid Rehousing plays an important role in the homeless response system, including reducing the amount of time a participant experiences homelessness and increasing access to permanent housing by quickly resolving the person's experience of homelessness while promoting tenancy stability and longevity. The National Alliance to End Homelessness (NAEH) published the Rapid Re-Housing Performance Benchmarks and Program Standards in March 2016 which provides details on performance benchmarks that would qualify a program as effective, as well as information on program philosophy and design standards that provide guidance on the broader role Rapid Rehousing programs play in ending homelessness. *[See Appendix G: Other National Resources + Best Practices]*

A: PURPOSE OF THE COMMUNITY OPERATING STANDARDS OF PRACTICE

This document is intended to serve as a guide to service providers and funders engaged in RRH activities in the San Diego Continuum of Care (CoC) Region to increase the effective implementation of RRH. These System-Wide Operating Standards of Practice (Standards) outline the local RRH model and define practice standards that support a unified understanding of the core elements and the expectations of RRH programs serving the homeless population primarily with HUD (and state dedicated) funds. The RRH Funders Workgroup (which includes representatives from the lead agency for the San Diego Continuum of Care – the Regional Task Force on the Homeless, the San Diego Housing Commission, and the County of San Diego's Housing and Community Development Services division) have committed to adopting these Operating Standards of Practice and encourage all other funders of RRH programs in the region to align with these standards whenever possible so that those experiencing homelessness have equitable access to programs and services regardless of funding source and/or which program they are enrolled.

These Standards were created by the RRH funders group and informed by the RRH Learning Collaborative Team and are based on the NAEH Benchmarks as well as other national promising practices and guidelines developed by the U.S. Department of Housing and Urban Development (HUD), the U.S. Interagency Council on Homelessness (USICH), the U.S. Department of Veterans Affairs (VA), federal technical assistance providers, and other high-performing RRH providers across the country. They outline the minimum requirements for the operation of RRH programs in the San Diego Region. RRH programs are expected to adhere to the Standards outlined in this document, unless otherwise specified within their respective funding contracts, as well as to identify best practices which all RRH programs should strive to implement. This document and these operating standards are intended to be used in conjunction with project contracts and will be incorporated into the broader Continuum of Care Community Standards. *[See Appendix D: list of Participating Agencies]*

B: RAPID REHOUSING IN THE SAN DIEGO REGION

We are committed to creating a rapid rehousing system in the San Diego region that is 'right-sized' to adequately meet the needs of persons experiencing homelessness in our community while also addressing the needs of specific populations. We believe that RRH services must be client-centered, customized for the family/individual being served, and that our data and outcomes should be transparent and accurately reflect what is happening in our community. We will ensure that participants have tailored interventions that include housing search support, rental assistance and case management that will scale up and/or down based on a progressive engagement model, where the minimum amount of services is provided before increasing support to meet the household's needs.

Our VISION for RRH in the San Diego Region is that we have:

- A high-functioning system that is appropriately resourced to meet established outcomes for our participants,
- Clear guidelines and standards of practice that are implemented consistently and transparently, are person-centric, and empowers programs to provide the right amount of assistance for each household,
- Aligned funding with the right amount of resources and support to meet community need, and
- A provider network that has adequate support and resources to effectively serve our neighbors who are experiencing homelessness.

Our GOAL is that by increasing the capacity and effectiveness of RRH as part of our continuum of services in the San Diego region we will achieve: :

- A reduction in the length of time program participants experience homelessness
- Increased exits to permanent housing
- A reduction in returns to homelessness

C: CORE COMPONENTS OF RAPID REHOUSING

Rapid Rehousing is an intervention designed to help households quickly exit homelessness by obtaining housing and remaining stably housed. The three <u>components of RRH</u> include:

- ✓ **Housing Identification (Search and Placement):** The goal of housing identification is to quickly locate housing for individuals/families experiencing homelessness. This includes several activities such as recruiting and engaging landlords and helping participants locate and secure housing that is safe and affordable.
- ✓ **Financial (Rental and Move-in) Assistance**: The goal of rental and move-in assistance is to help with the costs associated with obtaining housing through short-to medium-term financial support. The amount and duration of this varies, but at a minimum assistance should be based on the level of need to secure and maintain a place to live and flexible enough to meet the unique needs of each participant.
- ✓ **Case Management and Supportive Services**: The goal of RRH case management is to help stabilize participants to retain housing. Once housed, RRH participants are provided with voluntary services by the service provider and connected to other needed services and supports to stabilize and promote successful tenancies. Case management shall focus on helping people navigate barriers that may stand in the way of securing and maintaining housing and build a support system by connecting them with people and programs in the community.

SECTION II: RAPID REHOUSING COMMUNITY OPERATING STANDARDS OF PRACTICE

As the local homeless response system continues to evolve, there is an increased need for system-wide alignment around common goals and outcomes, program models and activities, and performance standards. Fidelity to these Standards will help ensure that RRH funding is administered consistently, transparently, and as effectively as possible across the region, and that all participants enrolled in RRH will be provided similar experiences and opportunities to attain housing regardless of which service provider they work with. These Standards will also facilitate system-wide evaluation and a continued improvement process to support participants experiencing a housing crisis in our community. Each section in this document will provide a framework for operational policies and procedures, including both the basic minimum standards that programs are expected to follow, as well as best and recommended practices for optimizing program performance. The Regional Task Force on the Homeless (RTFH) will continue to build upon and refine these Standards as we further learn and 'right-size' service delivery in our region and as RRH best practices evolve nation-wide.

A: OPERATING PHILOSOPHY & DESIGN

RRH must be client-driven and tailored to the unique needs of each household being served. Programs operating RRH are expected to employ a *Housing First, Low Barrier, Harm Reduction, Trauma Informed, and Client-centered* approach that accounts for the special needs of the population they are serving. Programs shall have policies that clearly state an approach to working with households that embrace these practices. Programs shall develop and maintain a set of policies and ensure a process for educating and training program staff on the following practices:

HOUSING FIRST

The Housing First philosophy is based on the premise that stable housing is a critical determinant of health, education, employment, and other positive outcomes related to well-being. Housing First is an approach to connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry. In line with this philosophy, all agencies providing RRH shall operate their programs using the Housing First model, contributing to the regional goals of ensuring instances of homelessness are rare, brief, and non-recurring. Specifically, RRH programs shall not require any preconditions for admittance to the RRH program (other than explicitly defined per program funding contracts). Nor shall programs exit a participant from their RRH program solely due to factors such as a lack of sobriety or income, or based on the presence of mental health issues, or disabilities.

LOW BARRIER

Low barrier is an active approach to the Housing First model that ensures participants may quickly exit homelessness without eligibility requirements that historically prevent households experiencing homelessness from accessing affordable housing options. RRH programs shall have written policies and procedures that are designed to serve ("screen in" rather than screen out) participants who have the highest barriers to housing, such as very low or no income, poor rental history, or criminal records.

HARM REDUCTION

Programs operating RRH shall use harm reduction strategies while working with participants. This means programs will not terminate assistance based on criteria that would include things such as a sobriety requirement or due to medication non-compliance. Service strategies shall include all possible approaches to assisting participants in their efforts to reduce or minimize harm and to stabilize in their environment. Harm reduction strategies are not intended to prevent addressing a participant's actions and behaviors that constitute a threat to the safety of other participants or staff.

TRAUMA INFORMED CARE

Programs shall incorporate trauma informed care policies and procedures into their services. Trauma informed care is defined as an organizational structure and service framework that involves understanding, recognizing, and responding to the effects of all types of trauma that participants may experience. Trauma informed services account for trauma in all aspects of service delivery and prioritize the trauma survivor's safety, choice, and control.

CLIENT CENTERED

Programs shall have policies and procedures that ensure that the resources and services provided are tailored to the individualized housing stability goals created by the participant in collaboration with their Case Manager. *[See Appendix I: Glossary for more information on the above practices].*

B: IMPLEMENTING THE CORE COMPONENTS OF RRH: HOUSING IDENTIFICATION & ATTAINMENT

The goal of housing identification is to quickly locate affordable housing options for participants experiencing homelessness. Activities include recruiting and engaging landlords, assisting participants with housing search and coordinating activities with other providers/entities involved in the housing process. Staff will be trained and equipped with necessary training and tools to successfully support this component. Programs shall have policies and procedures in place for the components below.

LANDLORD RECRUITMENT, ENGAGEMENT & RETENTION

Programs shall have written policies and procedures that outline their process for building and maintaining a pool of partner landlords, including how they will engage in continuous recruitment activities and, at a minimum, offer a basic level of support to all landlords who lease to program participants. These policies must clearly summarize protocols, points of contact at the agency, communication methods and expectations, and shall be distributed to landlords.

- **Staff roles:** Programs shall employ at least one (1) staff person who is responsible for landlord recruitment and engagement activities. This includes outreach to and negotiation with

landlords/property managers as well as ongoing support and engagement. If Programs do not currently employ a dedicated landlord or housing specialist, they must then include these specific responsibilities in the Case Manager's job description*.

- **Skills and training**: To provide support to landlords and program participants, the staff person responsible for landlord recruitment, engagement and retention shall have the knowledge and skills to understand landlord and tenant rights and responsibilities. Housing/Landlord Engagement Specialists should possess the knowledge and expertise needed to communicate with landlords in their own 'language' and provide accurate information to participants. Staff responsible for housing search/landlord engagement shall be trained in and familiar with the following:
    - o Tenant rights
    - o Conflict resolution/mediation/negotiation
    - o Federal, state, and local Fair Housing Laws
    - o HUD Housing Quality Standards (HQS) and/or Habitability checks (per specific funding requirements)
    - o Lead-based paint visual inspections (per specific funding requirements)
- **Supports for Landlords**: Programs shall regularly and proactively connect with the landlord/property manager to address concerns and answer questions. Programs shall have policies and procedures that state their internal process for communication and response to landlord requests (for example, is there a 24-hour phone line; if their main point of contact is unavailable, who is the back-up contact; what is the expected timeframe in which calls will be returned, etc.). In addition, where appropriate, programs should leverage community resources, such as LEAP and the Flexible Housing Pool (FHP) whenever possible *[see Housing Search section below for more information].*

> ***Best/Recommended Practice:** While it is not currently required that programs have dedicated staff for this function, it is best practice to separate housing identification/landlord recruitment and engagement from case management. The skills and experience required for effective housing identification and negotiation are different and specific from those of Case Managers, therefore employing staff who are trained and have the time dedicated to active recruitment, engagement and retention is recommended. Programs that do not have the staffing or budget to include a separate position should include this position in future budgets/funding requests or talk to their contract monitor about adjusting current staffing structure.

HOUSING SEARCH

Programs shall have policies and procedures that outline which housing search/location activities the Housing/Landlord Engagement Specialist or Case Manager will assist with versus what the participant is expected to do on their own (or if the program utilizes other community-wide housing assistance programs, such as LEAP or FHP). These policies shall be written and provided to the participant at intake. Upon enrollment, Program staff shall conduct assessments with participants to address housing barriers, needs and preferences. Staff shall develop an action plan with the participant which will include assisting program participants in identifying units that are desirable and sustainable - those that are in neighborhoods where they want to live, have access to transportation, are close to employment or school, are safe and within the limits of the participant's budget (or projected future budget). Staff shall assist with applications and negotiations with landlords/property managers, as well as assist with obtaining necessary documentation for meeting landlord requirements, when needed. Housing search and support activities include:

- Assessing tenant needs and barriers to housing placement
- Setting family or individual expectations on location, size and/or rent
- Conducting a targeted housing search with a housing affordability plan (household budget)
- Resolving or mitigating tenant screening barriers, such as rental and utility arrears or evictions
- Providing support for innovative housing options including roommates or shared housing with family or friends
- Supporting participants with completing rental applications
- Helping participants to obtain necessary identification

- ▪ Supporting participants with setting up utilities and making moving arrangements

[See Appendix F: Example Tools and Forms for examples of landlord engagement and housing search resources]

Housing Location Resources

RRH Program staff are encouraged to utilize and partner with housing location resources within the community where available/appropriate to gain access to affordable housing units for participants. Leveraging these resources allows Case Managers to coordinate with landlord liaisons to address any landlord-specific issues, reduces the number of people the landlord engages with, increases customer service, and helps the landlord liaison continue to build their relationship. Some local resources that may be available include:

- ➢ **Flexible Housing Pool**

In San Diego County, one of the primary challenges to addressing homelessness is the lack of available rental units in the community. Because of this, the Regional Task Force on the Homeless along with partners including the County of San Diego, and Funders Together to End Homelessness San Diego (FTEHSD), created the regional Flexible Housing Pool (FHP) to use flexible funds to help provide streamlined access to rental units and ensure ongoing housing stability. The FHP is intended to cover the entire county, including all 18 cities and the unincorporated areas. FHPs are an innovative model that have successfully been implemented in other communities across the country including Los Angeles, San Francisco, and Chicago, IL. Key components of the San Diego FHP include:

- ▪ **Centralized landlord engagement** efforts under a single entity
- ▪ **Dedicated staff** members focused on partnering with community-based landlords and securing available units in the private rental market to create an inventory of available units that can be matched with prospective San Diegans experiencing homelessness.
- ▪ **Flexible funds** to create a pool of real-time available units in the community for homeless households to access
- ▪ **Funds to pay for needed housing expenses** including application fees, deposits, utility arrears, and furniture and other household goods.
- ▪ **Collaboration with existing programs** that offer both rental assistance and housing-based case management and supportive services
- ▪ **Dedicated staff** members to provide **housing tenancy services** and coordinate with the landlord, the supportive services program, and the participant to ensure ongoing housing stability

San Diego FHP partners selected Brilliant Corners, a nationally recognized non-profit known for their administration of the LA County Flexible Housing Subsidy Pool, to operate the FHP in San Diego. In the first year, the goal is to acquire 140 private market units for homeless Veterans, youth, and families. with plans to eventually expand the program to all homeless services providers in the San Diego region.

- ➢ **LEAP**

The San Diego Housing Commission's (SDHC) Landlord Engagement and Assistance Program (LEAP) works directly with landlords, housing service providers and clients to identify units and provide one-time financial assistance to remove barriers to obtaining housing. LEAP is part of HOUSING FIRST – SAN DIEGO, SDHC's homelessness action plan, which launched in 2014. HOUSING FIRST – SAN DIEGO creates more than 1,300 housing opportunities for individuals and families at risk of or experiencing homelessness each year. LEAP partners with more than 35 housing service provider organizations, and offers housing search and placement services, one-time financial assistance for eligible move-in costs and incentives and benefits for the landlord to quickly secure units for our mutual clients.

LEAP incentives and benefits include:

- ▪ **Housing Search and Placement Services**: LEAP Housing Specialists are skilled in locating and securing rental units in the City of San Diego through landlord outreach and ongoing relationship building efforts
- ▪ **Landlord Incentives**: $500 for the first unit landlords rent to a homeless household and $250 for each additional unit
- ▪ **Security Deposits**: Up to two times the contract rent for security deposits

- **Utility Deposits**: Pays for security deposits to activate utilities and arrears from a previous residence if it poses a barrier to housing
- **Landlord Contingency Fund**: Reimburses landlords for any eligible expenses such as repairs, unpaid rent and legal fees that exceed the security deposit
- **Application Fee/Screening Fee** assistance
- **Vacancy Loss Payments** to secure rental units for program participants
- **Dedicated Staff** to answer landlords' questions

For more information on LEAP, contact the Housing Commission by emailing housingfirstsandiego@sdhc.org
[See Appendix H: San Diego Region Landlord Engagement Models for additional information on both programs]

RENT REASONABLENESS & FAIR MARKET RENT
For most publicly funded programs, rental assistance will only be provided if the total rent for a unit complies with HUD's Rent Reasonableness standards and Fair Market Rent (FMR) limits. HUD's rent reasonableness standard is designed to ensure that rents being paid are reasonable in relation to rents being charged for comparable unassisted units in the same market. Programs shall have a written policy (that complies with their specific funding source) and procedure in place to ensure that compliance with rent reasonableness standards is documented prior to executing the lease for an assisted unit. Rent reasonableness policies and procedures must be transparent and consistently applied across their projects, and result in decisions that comply with HUD and/or other funding requirements. At a minimum, a rent reasonableness policy should include a methodology for documenting comparable rents, standards for certifying comparable rents as reasonable, staff assigned to completing this task, and strategies for addressing special circumstances. (e.g., the procedures would provide step-by-step guidance on how to make comparisons between the proposed unit rent and rents for comparable units in that community; the forms would ensure that similar information is included in each case file and would prompt staff to record considerations and conclusions made throughout the process). The program's policy should also specify the definition of "reasonable". For example, a policy could require staff to collect rents for no less than three comparable units and could allow as "reasonable" only rents that are lower than $50 above the average of the three comparable rents. In this example, rent could be paid that is slightly higher than the individual comparable units and would still be considered "reasonable" under the program's policy. Comparable rents may be checked using a comparison of rental units in the area. Programs shall support participants in making informed choices about 'rent-reasonable' options with the goal of maintaining housing after program exit. This includes assisting participants in exploring all viable housing options that are safe and meet the participant's needs, including shared housing options.

The other key standard in determining the level of program funds that can be used to pay rent for an eligible program participant is the **Fair Market Rent (FMR)** amount for the geography in which the unit is located. HUD establishes FMRs to determine payment standards or rent ceilings for HUD-funded programs that provide housing assistance, which it publishes annually. Federal law requires that HUD publish final FMRs for use in any fiscal year on October 1—the first day of the fiscal year (FY). The FMR standard is applied to ensure that a reasonable supply of adequate but modest rental housing is accessible to program participants. FMRs for each fiscal year can be found by visiting HUD's website at www.huduser.org/portal/datasets/fmr.html and clicking on the current "Individual Area Final FY20__ FMR Documentation" link. This site allows recipients and subrecipients to search for FMRs by selecting their state and county from the provided list. The site also provides detailed information on how the FMR is calculated for each area.
[See Appendix E: HUD Guidance, Regulations & Tools for more information]

TENANT-BASED LEASE REQUIREMENTS
Programs shall have written policies that require that all participants have a signed lease directly with the landlord/property manager that meets legal standards, including shared housing participants. In general, program participants must be the tenant on the lease for a term of at least one year that is renewable and terminable only for cause. In some cases, a 12-month lease term may pose a barrier to obtaining housing. In these cases, programs should follow the requirement in their respective funding contract for the required length of a lease to determine whether exceptions can be made. The policy shall state that the participant must pay their portion of the rent directly to the landlord each month. The Program will pay any remaining amount

9

(subsidy) directly to the landlord. Programs shall have written procedures that verify lease terms prior to administering financial assistance. In addition, Program staff must be trained and able to explain landlord-tenant rights and responsibilities, federal, state, and local fair housing laws, as well as lease requirements/provisions to the participant.

> ***Best/Recommended Practice**: Program staff should accompany participants during lease signing and move-in to ensure participant understands all aspects of the lease agreement and the expectations of the landlord/property manager.

HABITABILITY (STANDARDS AND HQS INSPECTIONS)
All units supported through RRH funding must meet certain habitability standards prior to a participant entering into a lease for the unit. Program staff shall be trained in these aspects and must ensure that all units are safe and meet these specific contract requirements. Refer to funding requirements to determine whether a Housing Quality Standards or Housing Habitability Standards form should be used. *[See Appendix C: Funder Eligibility and Requirement Chart].*

C: IMPLEMENTING THE CORE COMPONENTS OF RRH: FINANCIAL ASSISTANCE/RENTAL SUBSIDIES

Financial assistance is the second core component of RRH, providing flexible assistance to cover move-in costs, deposits, and the rental assistance necessary to move out of homelessness and quickly stabilize in permanent housing. A Progressive Engagement approach should be used to determine how much financial assistance is needed based on each participant's strengths and needs. While our community is leaving it up to each program to set its own specific rental assistance model (how initial amount/duration is set), RRH programs shall have a documented step-down Rental Assistance (RA) model and written policies and procedures that apply to all participants seeking RRH assistance using progressive engagement.

USING A PROGRESSIVE ENGAGEMENT RENTAL ASSISTANCE MODEL

Progressive Engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those participants who struggle to stabilize and cannot maintain their housing without assistance. Progressive Engagement recognizes that there is no way to accurately predict how much help someone may need to end their homelessness and avoid a return to the streets or shelter. While we know that many people can successfully exit homelessness and avoid immediately returning with a small amount of assistance, we also know

> **Why Progressive Engagement?**
>
> **Avoids false assumptions:** People who have low or no income or may be disabled, including those who score high on assessment tools – do not all need or want more intensive or longer-term assistance.
>
> **Taylors to the specific need:** When a participant shows they need more help, help can be provided. Progressive engagement allows the program to offer the right amount of assistance for the right amount of time to meet individual needs.
>
> **More effective AND efficient:** Rapid Rehousing programs that use Progressive Engagement show high rates of success serving people with a wide range of needs. Programs take risks, frequently must make tough decisions, and assume some will ultimately need different interventions. And by avoiding more assistance than is required, programs can help more people, close housing placement gaps, and reduce the time people remain homeless.

that there are no dependable predictors to guide the amount of assistance needed. A Progressive Engagement approach lets each household demonstrate what they need through frequent reassessments with their provider while in their own permanent housing. Using the approach allows a system to serve more households, reduce lengths of homelessness and ultimately reduces homelessness across the system. In this approach, participants are initially offered "light-touch" assistance, including help creating a reasonable housing placement/stabilization plan, housing information and search assistance, and limited financial assistance for arrears, first month's rent, or security deposit.

- ✓ Programs using Progressive Engagement regularly re-assess the participant's situation and seek to close cases as soon as housing retention barriers are resolved
- ✓ Program design is not a one size fits all and financial assistance is not a standard "package". Start with minimal assistance and use a progressive approach to determine the duration and amount of rent assistance and case management monthly.
- ✓ It is flexible enough to adjust to a households' unique needs and resources as participants' financial circumstances or housing costs change (can be adjusted through regular assessment)
- ✓ Programs offer more intensive support, additional rental assistance, or step-up referrals and help to access community-based assistance as needed

RENTAL ASSISTANCE STANDARDS AND BEST PRACTICES

Program participants may receive rental assistance on a short- or medium-term basis, depending on their circumstance and need, but in most cases can be up to 24 months (depending on funding source). It is expected that program participants will receive the level of assistance necessary to be stably housed for the long-term and that programs administer rental assistance in a way that is flexible and consistent across all participants. Financial assistance shall not be a standard "package" that is automatically applied, rather it shall be flexible to meet the participant's unique needs. RRH programs should structure their assistance to be provided in an individualized, flexible, and progressive manner. In this way, programs can maximize the ability of available resources to serve the largest number of people possible. The flexible nature of the RRH program model allows agencies to be responsive to the varied and changing needs of program participants and the community.

Programs shall ensure their programs are structured to provide individualized, flexible assistance that:
- ✓ Targets assistance to be short-term initially and increases or extends as needed for the participant to maintain housing
- ✓ Includes regular case reviews to ensure housing plan progress, review needs, and determine additional assistance, if needed

The San Diego Region CoC believes that a hybrid model which combines a declining subsidy and progressive engagement is a best practice from both participant outcome and grant management perspectives. Providers in the San Diego Region CoC shall use a step-down subsidy structure for RRH rental assistance. This means the subsidy declines from its initial level on a fixed or "step-down" schedule that is flexible/adaptable to adjust for changes in the participant's circumstances when needed. The declining subsidy structure should be based on a household's income, meaning that the participant's rental portion will be a percentage of their income. RRH programs must have a policy and procedure that outlines the declining subsidy structure/schedule and participants should be made aware that the amount of the subsidy will change and that the participant will take over the full amount of the rent while enrolled in the program. At a minimum, written protocols shall clearly outline the methodology for determining the amount or percentage of rent each program participant must pay each month (and how that is calculated), the maximum number of months a participant may receive rental assistance, and the extent to which a program participant must share in the cost of rent. This policy must be flexible and utilize a Progressive Engagement model to determine the right amount and length of assistance for each individual or household, while being applied consistently amongst participants, and state how any exceptions to this model will be determined/approved. *[see appendix F: Example Tools and Forms for example Rental Assistance Models]*

Note: Participants with no income are eligible for Rapid Rehousing and cannot be denied RRH solely based on limited or no household income. Participants with no income would not pay any portion of their rent until they obtain income. Programs shall have a process in place to address participants who have no income and are not able to pay any portion of the rent on their own after a designated amount of time (6 months) *[See Re-Assessment section below for more details]*.

CLIENT BUDGETS

Programs shall assist participants in the development of a client-driven budget, (an h*onest budget* – which incorporates the expected or actual expenses to maintain housing) **which will be revisited as often as needed, but no less than every 30 days**.

Other Allowable Costs: While rent related costs are the most common in RRH, financial assistance for other costs is allowed, depending on specific funding sources, if it <u>contributes to permanent housing and stability</u>. Allowable expenses will vary by fund source, but often include:

- Move-in costs, including deposit and first month's rent
- Rental application fees and payments for background or credit checks
- Previous housing debt/rental arrears, if resolving will facilitate an immediate housing placement
- Utility deposits and arrears needed to secure housing
- Moving costs

COMMUNICATION WITH LANDLORDS/PROPERTY MANAGERS

To help landlords understand the program and to set expectations, providers should send a letter or document to the landlord outlining the details of the program, including the contact information for the Case Manager or Housing/Landlord Engagement Specialist who will be responsible for ensuring rental subsidies are paid to the Landlord each month. *[See Appendix F: Example Tools and Forms for example Landlord Expectations Letter]*

RE-ASSESSMENT

Each participant's situation/needs must be re-assessed regularly to establish continued eligibility for and amount of continued financial assistance. Re-assessment must be completed **at least every three months** (unless otherwise stated in your funding contract). If a participant is not housed before the first re-assessment is due, the Case Manager (or Housing/Landlord Engagement Specialists) and participant will review the participant's Housing Stability Plan *[see Section D: Case Management]* and address any barriers to achieving the goals. If progress is not occurring, the Case Manager should initiate a conversation around expectations and limitations of the RRH program. Once housed, the re-assessment must include at least the following components:

- Length of financial assistance to date
- Documentation of household income as a percentage of Area Median Income (AMI)
- Percent of income being paid toward rent ratio
- Progress on housing stability income and goals
- Any recent changes in circumstances that will impact income or ability to work
- Any gaps in resources or support networks inhibiting the participant's ability to retain housing once rental assistance ends

Occasionally, situations come up that put an extra, unexpected financial burden on a participant that affects their ability to pay their portion of the rent, or to need an extended amount of support. Programs shall have a documented process in place for Case Managers to case conference these situations with their supervisor in a way that is consistent across all participants. This would include situations such as:

- Participant has income but cannot afford to pay their portion of the rent due to special/unexpected circumstances
- Participant does not have income after 6 months of receiving 100% rental subsidy
- Participant cannot take over their full rent after 12 months of rental subsidy
- Participant needs an additional month or increased amount of assistance after increasing their income to rent ratio (for example, someone who had been paying 60% of their income towards rent that may need to be adjusted to pay only 40% of their income for the next two months due to unexpected medical bills)
- Financial assistance has ended but the participant needs emergency rental assistance during the 'post-subsidy case management period'
- Participant has a need to adjust their current living situation to help them better stabilize or maintain their housing, for example moving to a new unit that is closer to their job or to shift to a shared housing opportunity, etc. (this should be considered an acceptable strategy that is explored/accommodated for, not that is seen as punitive or a 'failure')

D: Implementing the Core Components of RRH: Case Management & Housing Stability Plans

Housing Focused Case Management

Housing-focused case management is the third component of RRH. The goals of RRH case management are to help participants ***quickly obtain*** and move-into permanent housing, support participants to ***stabilize and maintain*** their housing, and to ***connect*** them to community and mainstream services and supports, as well as to their natural support systems. All RRH programs shall provide participants with housing-focused case management that is tailored to identify the participant's strengths, address their housing barriers, and support housing stabilization with a focus on the participant's exit to permanent housing as quickly as possible. Services are voluntary and can be increased through progressive engagement if more services are necessary to help a participant stabilize in housing *[see section C above for more information on Progressive Engagement].*

Programs shall have written policies and procedures that outline how Case Managers will provide client-centered case management and how they will be trained on RRH case management strategies and related evidence-based practices, as well as on the Community Operating Standards of Practice, and any other internal policies. All case management policies and expectations must be clearly communicated with participants. Case Manager's job descriptions shall direct all case management to focus on housing and stability and use strengths-based practices *[see Appendix F: Example Tools and Forms for example Case Manager job descriptions].*

Program participants must connect with a Case Manager at least once per month (for case management, re-assessment, planning, etc. This is separate from support services, which are not required for program participants). Case Managers will support crisis resolution through creative problem-solving conversations about a participant's situation, housing options and resources for support. These conversations should be:
- Based in the belief that participants are resilient and resourceful and follow best practices including Trauma Informed Care and Motivational Interviewing
- Solution focused to quickly resolve a participant's homelessness
- Strengths-based, focusing on client strengths and resources
- An opportunity to brainstorm what resources a participant might have and identify who might be a useful support

In addition to the above, all case management and supportive services shall incorporate the following:
- ➢ **Client Choice/Client Centered Supportive Services:** Supportive services shall be participant-centered and voluntary. Supportive services shall be offered to participants but cannot be mandated. Under no circumstances should participation in services be a condition of occupancy. In other words, an RRH program may not terminate a participant solely for refusing to participate in supportive services. It is permissible, however, to require participation in basic case management with a primary goal of engagement, stability planning, and budgeting. *[See Frequency and Duration of Case Management section below for more details].*
- ➢ **Progressive Engagement Model:** As stated previously, Progressive Engagement is a key component of case management in RRH. Programs shall have policies that align with a Progressive Engagement approach, meaning services may increase/decrease, depending on the needs of the participant at any given time. It empowers participants to leverage their own strengths to obtain and maintain housing stability.

Housing and Service Plans

All program participants shall develop a Housing and Service Plan (or Housing Stability Plan) in collaboration with their Case Manager that is housing focused and participant driven with the goal of obtaining or maintaining housing stability. Housing and Service Plans shall identify the participants strengths, needs, goals and actions to be taken by both the participant and the Case Manager/housing location staff. These specific goals will depend on the participant's unique barriers to housing stability. Plans shall track progress towards goals and be updated frequently as the participant progresses or identifies new barriers. Programs shall have policies that clearly state that Housing and Service Plans will begin immediately once client is enrolled in the program and shall address the distinct phases of RRH (see below) and be updated regularly. Before being

housed this shall be reviewed and updated at least every 90 days. Once a client is housed, Housing and Service Plans shall be reviewed and updated regularly to assess progress (ideally every 30 days, but no less than every 90 days), and shall be documented and maintained in the client file.

Housing and Service Plan components should include:
- List of short-term, actionable goals pertaining to housing, including **moving into** housing and **maintaining** housing
- Focus only on barriers related to obtaining/maintaining housing
- Outline roles and expectations of participant versus program staff, and timelines for each step
- Date of next re-assessment to identify barriers and plan adjust, as needed

[See Appendix F: Examples and Tools for example Housing and Service Plan]

> Building rapport with a client early in the Case Manager/participant relationship is key!

PHASES OF CASE MANAGEMENT

During the housing attainment search phase, case management is focused on assisting a participant to quickly obtain and move-into a new housing unit. Case Manager's help participants resolve or mitigate tenant screening barriers, obtain necessary identification, support other move-in activities, and prepare participants for tenancy. They should work closely with Housing/Landlord Engagement Specialists (if applicable) to match the participant to an appropriate unit as quickly as possible. Case management focuses on addressing immediate barriers to housing and may be more frequent during this phase. Case management conversations during this phase should be solutions-focused and client-centered. The Case Manager should help participants think of creative housing solutions and brainstorm what resources a participant might have that would support quick housing and stability.

Housing & Services Plans During Housing Attainment: During this phase, the Housing and Service Plans (HSP) shall focus on finding and attaining permanent housing. This will include addressing barriers to obtaining a rental unit and collecting needed documents.

Once housed, Case Managers should work with participants to stabilize in housing. Based on participant needs, case management shall focus on how the participant can maintain a lease and address barriers to housing retention and other issues that have or may result in housing crisis or loss. Programs shall establish policies that clearly state that program staff shall proactively assist participants in avoiding evictions and maintaining a positive relationship with the landlord (working with landlords and participants to resolve tenancy issues without eviction). Policies shall also outline how staff will provide basic tenancy skills and learning opportunities, including landlord-tenant rights and good neighbor relations.

Housing & Service Plans Once Housed: Once the participant is housed, the HSP shall focus on housing stability and any housing retention barriers which the participant may face. During this phase, HSPs must focus on how the participant can maintain the lease, maximize their ability to pay the full rent on their own, and address any other issues that may hinder housing stability.

During the stability phase, Programs shall connect and refer participants to community resources and mainstream services, as appropriate, that can support the participant's ongoing success in housing and emphasizes the temporary nature of their enrollment in the RRH program (financial assistance). Case Managers help identify and access supports including family and friend networks; mainstream and community services (benefit services, food assistance programs, childcare resources etc.); and employment and income and help identify and resolve issues or conflicts that may lead to tenancy problems, such as disputes with landlords or neighbors, while also helping participants develop and test skills that they will use to retain housing once they are no longer in the program. Rental and financial management training should be made available as needed. Case management should strive to build a support system by connecting the participant with people and programs in the community. During this phase, case management may be lighter/less frequent and may continue even after rental assistance ends.

14

Exit Planning: When it is determined that the client is near program completion, Housing and Service Plans shall begin to focus on exit planning. This will include ongoing work with the Case Manager and participant until the participant is exited (from both rental assistance and case management). This shall include a plan for preventing a return to homelessness.

FREQUENCY AND DURATION OF CASE MANAGEMENT

RRH case management shall be participant driven and flexible in intensity, offering only essential assistance until the participant demonstrates the need for or requests additional help. The intensity and duration of case management is based on the needs of the participants and may lessen or increase over time. Housing Case Managers are expected to attempt to meet with participants at least one time each month in the client's home (or other place of the client's choice). If Case Managers are unable to set up a home visit or meet with a participant, they shall document attempts. The Case Manager is responsible for attempting to re-engage with clients and offer creative strategies to engage and support the client. If the Case Manager has not been able to meet with the participant for more than 30 days but has had contact with the participant and they are still in need of services, the Case Manager should continue to work with the participant on their housing goals. If a participant still needs and wants services but has missed scheduled appointments or communication is not regular, the Case Manager should initiate a discussion to reset the program expectations and revisit the participant's goals by reviewing the housing stability plan. The goal is to minimize or eliminate any exits for "non-compliance" or "lack of participation," especially if the homeless situation has not yet been resolved.

Programs shall have clearly defined policies and objective standards for when case management should be continued and/or ended *[See Section 6: Case Closing/Exit for more guidance].* The best practice is for RRH projects to have households take on the full amount of rent and continue to provide supportive services before exiting the household. This allows the household to continue to receive support as they are adjusting to taking over their rent and remain stably housed. It also adheres to the underlying philosophy that RRH should provide a basic amount of assistance, or just enough to help a household obtain and sustain housing. Program policies shall allow for participants to end financial assistance but continue case management for up to six (6) months (unless explicitly stated otherwise by a specific funder/contract). Whether or not case management continues and how frequently it occurs shall be up to the participant.

> ***Best/Recommended Practice**: To support the participant during the transition from rental assistance, it is recommended that programs offer to continue case management <u>for all clients</u> for at least 2-3 months post-rental assistance.

E: RRH AND COORDINATED ENTRY: ASSESSMENT, PRIORITIZATION, REFERRAL

Programs are required to utilize the Coordinated Entry System (CES) to fill all vacancies in their RRH programs (unless otherwise specified in funding contracts). Providers shall work with CES and follow all policies and procedures outlined in the approved CES Manual, which can be found <u>here.</u> Referrals to RRH programs follow the approved CES prioritization policies and will be based on an assessment of the participant's vulnerability as screened by the common assessment tool and stated community preferences. The CES processes are in place to serve the community's most vulnerable households/individuals from each of the intervention categories, move participants into the most appropriate housing of their choice; and meet participants' needs as quickly as possible.

*Note: At the time this document is released, the Coordinated Entry System policies and procedures are in the process of being revised. As these revised policies are adopted, this document will be updated.

CES ACCESS AND ASSESSMENT

RTFH does not limit access points to any specific subpopulation ensuring that people in all different populations and subpopulations, including people experiencing chronic homelessness, families with children, youth, and survivors of domestic violence, have fair and equal access to the Coordinated Entry System. All aspects of the

San Diego Coordinated Entry System are required to comply with all Federal, State, and local Fair Housing laws and regulations.

All RRH referrals will be based on a common assessment as part of the community's Coordinated Entry System. Using a common assessment tool is a vital component of a Coordinated Entry System as it establishes the same baseline for prioritization of all participants in the system. The approved common assessment tool currently in use for the CES includes Version 2 of the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT) for individuals, families, and transition age youth. This tool examines and scores an individual's or family's vulnerability level and provides a basis for prioritizing participants for housing opportunities. This triage tool also includes approved supplemental questions that targeted to address current living situation and vulnerabilities used for prioritization in matching participants with available housing programs and resources.

REFERRALS: PRIORITIZATION AND MATCHING

Prioritization for Referrals: Per 24 CFR part 578.37(a)(1)(ii), CoCs must establish policies and procedures for determining and prioritizing which eligible individuals and families will receive Rapid Rehousing assistance, further assistance should be prioritized based on vulnerability and severity of service needs to ensure participants needing the most help receive it in a timely manner. Currently, in the San Diego region, housing priority is determined according to the [CoC Community Standards](#), as below:
1. Chronically homeless individuals, youth, and families with:
2. The longest history of experiencing homelessness and the most needs
3. The longest history of experiencing homelessness
4. The most needs, particularly mental illness, or substance use disorder
5. All other: Non-Chronically homeless individuals, youth, and families

The San Diego CoC further defines "those with the most needs" as participants with a diagnosed serious mental illness, substance use disorder, children under the age of four, or adults with documented qualifying medical conditions.

Note: RTFH is working with the CES workgroup to update the prioritization policy. This will be updated in the first quarter of 2021 and will be amended in these Operating Standards to reflect the new prioritization.

Matching to Programs: Programs shall participate in and enroll participants into their RRH program exclusively from the CoC's Coordinated Entry System (CES), unless otherwise permitted through a contract/funder. Programs shall not 'deny' or screen out referrals from CES that align with their approved program eligibility (per funding contracts and submitted Eligibility Matrix). When a RRH program has capacity to accept new participants, they should send an email to CES (ces_referral@rtfh.org) stating the number of openings they have and for which specific program (programs should request only the number of referrals they have the CAPACITY to enroll). Ideally, letting CES know as much in advance as possible (i.e., letting them know you can enroll 3 new participants in the next two weeks) will allow CES to provide referrals in a timely manner and decrease the time programs must wait to enroll participants. Once CES is aware of program openings, referrals will be sent within 5-7 business days and are made based on vulnerability and housing needed to ensure that people who need assistance the most can receive it in a timely and consistent manner.

RRH CASE CONFERENCING
RTFH is currently working on revising Program Check-ins and Case Conferencing processes. As of the date these Operating Standards were released, Case Conferencing is on hold while written practices are in development. As new processes are established, these Operating Standards will be updated with an addendum outlining how the process for RRH will be incorporated.

PROGRAM ELIGIBILITY REQUIREMENTS
Before enrolling a participant into the program, providers must assess housing status to ensure eligibility. RRH programs require the participant to be experiencing literal homelessness as defined by the U.S. Department of Housing & Urban Development (HUD). Programs shall not impose any additional eligibility criteria above what is required or explicitly approved by their funder, including any eligibility criteria that require a period of

sobriety, or a commitment to participation in treatment or other services (or any other criteria used to "predict" long-term housing stability). *[See Appendix C: Funder Eligibility and Requirements Chart]*

In alignment with Housing First principles, the following criteria <u>may not</u> be used to determine program eligibility:
- Sobriety and/or commitment to be drug-free
- Participation in religious services or activities
- Participation in drug treatment services
- Lack of income at intake
- Identification

ENROLLMENT IN RRH
Once the program receives a referral for RRH, the provider should make at least 3 attempts to contact the participant within the first 48 hours. No later than within 10 days of referral, providers shall either complete the RRH eligibility determination and 'enroll' the participant in HMIS or, in the event they cannot contact the participant (or the participant refuses), 'deny' in HMIS so CES can be notified and the participant can be placed back on the priority list and a new referral sent to the provider. Case management should begin immediately after enrollment *[See section G for specific HMIS/data entry requirements].*

Additional Program Assessments
The primary focus of any additional assessment completed at program intake should be specific only to resolving the participant's current housing crisis. This means focusing on the circumstances of the crisis, the participant's barriers to obtaining and maintaining housing, and the reasons they are unable to solve their housing crisis without RRH assistance. This will be used to shape the Housing and Service Plan and not to determine eligibility for a program.

F: CASE CLOSING: EXITS & TRANSFERS
OBJECTIVE GUIDELINES FOR WHEN TO CLOSE A CASE
Programs shall have clear criteria and documented policies outlining when a participant should be exited from the RRH program. In alignment with the underlying philosophy that RRH should provide a basic amount of assistance, or just enough to help a household sustain housing, programs should generally cease providing financial assistance when any of the following occur:
- Initial housing stabilization goals are met
- The participant is no longer in need of or interested in RRH support
- The total rent plus utilities is a certain % or less of the participant's net income
- Despite multiple attempts to contact the participant (at a minimum weekly attempts should be made to contact the participant by the Case Manager), participant is non-responsive or not paying their portion of the rent (there is no communication from the participant in at least <u>60 days</u>)
- Client/participant is being transferred (through CES) to another housing intervention

Upon exit, Programs should ensure participants have a plan to increase stability and access community-based supports to avoid a return to homelessness (what to do, resources available, how to access, etc.).

Closing Due to No Contact from Participant
Case Managers must check-in with RRH participants at least once a month while enrolled in the program. No matter which stage the participant is in the program, it is always the responsibility of the Case Manager to contact the participant. All possible methods of contacting the participant must be explored. If there is no contact after 60 days with weekly attempts to reach the participant, the Case Manager should exit the participant from the program (a final attempt to contact must be in writing and kept in the participant file, allowing five business days to respond). If the participant calls after that period and is still experiencing homelessness, the Case Manager should help them reconnect with Coordinated Entry.

Exiting Participants Prior to being Housed

Programs shall have a policy that describes when a participant would be exited from the RRH program in the event the participant is no longer able to be found (during the housing search phase). The policy must clearly state the timeframe (for example, after 60 days) and what documentation is required to document attempts by the Case Manager to locate the participant. The participant may not be exited from the project due to unit refusal. However, if participants refuse to engage in the application process or declines an excessive number of units, program staff should meet with the participant to better understand their needs and explain program limitations, as well as participant's responsibility. A participant may decline to participate in the RRH program at any point in the process.

TRANSFER GUIDANCE FOR INCREASING HOUSING INTERVENTIONS

A sound and successful Coordinated Entry System considers the need for transfers between program types to better meet the preferences and needs of a household. A key component of any transfer process is an on-going assessment of a household to determine whether the levels of service are appropriate or need to be increased or reduced. Because it is not possible to know or predict the needs of all participants/individuals when they are originally prioritized for a specific housing intervention, the community will need to address participants who have been housed in RRH but need another type/level of service and housing. This guidance applies to household's currently participating in RRH and who have been identified as possibly needing an increased housing intervention. **RTFH is working to develop a comprehensive process to address transfers within the Coordinated Entry System. Until then, the following guidelines will be used by the RTFH to determine the appropriateness of a transfer:** Transfers between programs occur when a participant needs to move from one housing intervention type to another. A variety of reasons may exist for a participant transfer, but the priority is to ensure the health and safety of participants, to prevent returns to homelessness, and to keep the participant stably housed. In the event a participant who has moved into a unit through RRH has had a change in circumstances or has increased needs that will create barriers to continued stability in their own unit without ongoing housing and/or supportive services, the program shall notify RTFH/CES to initiate a "Request for Transfer Conference" [utilize the form in Appendix B: Request for Transfer Conference]. Once you send the request, someone from CES will follow-up with you within 3 business days to determine next steps. If it is deemed appropriate for a Transfer conversation, a Case Conferencing meeting will be scheduled within 5-7 business days to discuss options and determine the best course of action. If it is determined that the participant needs to be referred to a new housing intervention type, CES will outline and initiate the process to refer the participant to an available resource and will provide the program a new RRH referral.

Examples of when this type of 'transfer' might be appropriate include:
- When a participant needs longer-term housing support than RRH can offer and would be better suited for permanent supportive housing or other resources
- Participant was placed in rapid rehousing as a bridge to permanent supportive housing.

NOTE: The above guidance ONLY refers to 'transfers' from a RRH program to a different housing intervention type through CES. It DOES NOT apply to the following circumstances:	
It does not apply when a program needs to move someone from one unit to another unit.	*For example*: If a program is providing RRH to a family, and because of a change in the composition of the family or for health or safety reasons, the participant needs to move to a different unit or different area of the community, the program should work with the participant to move the participant. CES does not need to be notified or do anything in this circumstance unless the program needs an additional referral to fill the original unit.
In addition, a program should not ask CES for a 'transfer' to another RRH program because the subsidy/rental assistance is 'expiring' (ending).	*For example*: A Program should not provide a participant with a 3-month subsidy and then ask CES to transfer them to another RRH program for additional months of subsidy. If this situation arises, the current program should be using a progressive engagement model to adjust the participant's subsidy as appropriate.

Program transfers may be appropriate from rapid re-housing to permanent supportive housing so long as the household meets the eligibility criteria under the specific program and the requirements for the Permanent Supporting Housing project in the Notice of Funding Availability (NOFA) for the year the project was awarded.

REFERRALS & WARM HAND-OFFS AT CLOSING

All RRH programs should establish clear referral processes with other community partners/service agencies to ensure seamless transitions to non-crisis services before participants are exited from the RRH program. Case Managers should attempt "warm hand-offs" between programs if a transition or referral occurs and work collaboratively with community partners to provide transparency and the best support for the participant.

G: PROGRAM ADMINISTRATION & OPERATIONS

STAFFING & CASELOADS

Providing quality case management services is critical to housing acquisition and retention in RRH programs. Programs will need to assess the expectations placed on different staff positions and the level of service availability. Programs shall provide adequate staffing to perform RRH services with appropriate on-going training for service delivery. Programs shall establish policies and procedures to ensure that Case Manager/client ratios are appropriate to provide the level of services needed to participants and do not exceed any specific funder guidelines. Programs should evaluate how they are supporting individuals that are in housing or referred to their program, ensuring staff capacity to meet the varying levels of need clients will present with, and have the ability to pivot when some clients need more support and others need less. When thinking about staffing levels, assume you will have a mixed caseload, with some clients having lower acuity and some with higher acuity at any given time. Consider structuring your staff case load to balance out so each Case Manager has a mixed load. *[See Appendix F: Example Tools and Forms for an Example of Mixed Acuity Staffing Matrix]*

➢ **Staff Roles/Staffing Plan:**

Programs should evaluate the different staff roles in their RRH program and consider adjusting their structure if necessary, to increase capacity and ensure they have the right amount of staff with the appropriate skills. Common staff roles include: **RRH Case Manager** - the person primarily responsible for providing ongoing Case management throughout the client's time in the program, providing varying levels and focus of case management depending on which phase of RRH the client is in; **Housing/Landlord Engagement Specialist** - this person is primarily responsible for outreaching to and engaging with landlords, doing property searches, supporting clients throughout the housing search process, including creating honest budgets, understanding the terms of the lease, and doing unit inspections. When programs have both staff positions, they would work closely together with clients while each holding distinct roles. Once the client is housed, the Case Manager would maintain ongoing contact with the client. **Program Manager/Director** generally the person responsible for overseeing the RRH program, including planning and projecting program budget, overseeing client/Case Manager assignments and ratios, determining when the program has capacity for additional clients, and approving rental subsidy models and exceptions to the approved model. *[See Appendix F: Example Tools and Resources for example job descriptions]*

➢ **Training/Onboarding:** Within 30 days of hire, new staff must be oriented to the basic program philosophy and the RRH System-wide Operating Standards of Practice. Staff who provide direct services and those who supervise staff that provide direct services should be trained in the core components of RRH, as well as the following:
- Housing First and Progressive Engagement approaches
- Trauma Informed services
- Harm Reduction
- Local Coordinated Entry policies and procedures
- HMIS/CES requirements and procedures

HMIS AND DATA ENTRY/COLLECTION STANDARDS

RRH Programs are required to enter data in the Homeless Management Information System (HMIS), collecting all required data and taking steps to meet quality data entry standards. Prompt and accurate data collection is imperative for the homeless system to understand and evaluate the impact of RRH and make system

19

improvements. Programs shall enter and maintain data in the RTFH-approved HMIS and comply with the HMIS Policies and Procedures, including those for data collection, data entry, data quality, standards for missing data, incomplete data, and timeliness of data entry. To read more about the standards and to find information about training please follow this link: https://www.rtfhsd.org/about-coc/homeless-management-information-system-hmis/

Data Element	Definition
Program Entry Date	This is the date the CM and participant first meet and complete an intake. Programs must enroll the household in HMIS within 24 hours of intake.
Date of Move-in	This is the date the participant moves into housing and begins receiving rent assistance. This date should fall after the Program Entry Date. Programs must complete this data entry in HMIS within 24 hours of move-in.
Program Exit Date	This is the date the participant stopped receiving financial assistance AND case management services. This date should fall after the end of any month where rental assistance was paid for that month. This date should fall after the Date of Move-In (or on the date of Move-In if the participant is only receiving move-in assistance and no rental assistance). Programs must complete this data entry in HMIS within 24 hours of exit.
*Programs must "Deny" a participant who cannot be found or 'refuses' in HMIS within 10 days of referral.	

Data Entry Flow (Key Project Dates for RRH):

Participant is referred to your RRH project

⬇

Initial meeting with participant to determine eligibility/client choice into RRH

⬇   ⬇

| "Enroll" in HMIS   OR   "Deny" in HMIS |
| (immediately upon intake into the program)   (if participant is not eligible for RRH) |

⬇

Housing search phase

⬇

| "Move-in Date" |
| (the actual date the participant moves into the unit) |

⬇

RRH rental assistance/case management

⬇

| "Exit" from project in HMIS |
| (the date the participant is closed – is no longer receiving a subsidy or case management and is being closed/exited from your program) |

For RRH projects: A Housing Move-in Date must be entered regardless of whether the RRH project is providing the rental assistance for the unit. For example, if an RRH project provides supportive services, but is not providing the rental assistance for the unit, a Housing Move-in Date must still be entered to differentiate RRH clients in housing from those still experiencing homelessness.
[See: https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf, Page 87]

Note: Victim service providers must not enter client-level data into HMIS, instead they must use a comparable database to collect client-level data.

DOCUMENTATION

Programs must document and maintain records related to participant eligibility and services provided to participants per their specific contract, including the following:
- Homeless status
- Services and assistance provided
- Housing and Services Plan
- Annual income

Programs must also have written processes for the following that are documented and accessible to all program participants:
- Client Rights and Accommodations
- Program Expectations
- Client Grievance and Feedback policies

PROGRAM BUDGETING/PROJECTING PARTICIPANT ASSISTANCE

Programs should ensure that their program management and finance staff are trained and understand the RRH rental assistance process. They should have a clear procedure for administering checks for financial assistance that outlines the process a Case Manager or Housing Engagement Specialist must follow to request monthly subsidy checks and the timeframe that checks can be cut and delivered to landlords.

Because of the unknown nature of RRH (how many participants will need different levels of rental assistance or lengths of subsidy), one of the aspects that can be challenging for a RRH project is projecting and managing the rental assistance budget. Programs will be supported through training and tools to better plan and prepare project applications/budgets, as needed. *[See Appendix F: Example Tools and Forms for different tips and tools to use when determining a RRH project budget]*

PARTICIPATION IN RAPID REHOUSING COMMUNITY OF PRACTICE

The **RRH Community of Practice** is intended to support ongoing learning and improvement. This space is an opportunity for RRH providers to come together to learn from each other's experiences, problem-solve, share best practices, and connect with funders and system-leaders. All RRH providers are expected to participate. The RRH Community of Practice will replace the RRH Learning Collaborative by Q3 2021 and will be designed and led by the RRH providers and supported by funders and other RTFH staff/consultants.

APPENDIX:

- ❏ Appendix A: [Considerations for Special Populations/Projects](#)
- ❏ Appendix B: [Request for Transfer for Increased Housing Intervention Conference Form](#)
- ❏ Appendix C: [Funder Eligibility + Requirements Chart](#)
- ❏ Appendix D: [List of RRH LC Programs + Funders](#)
- ❏ Appendix E: [HUD Guidance, Regulations + Tools](#)
- ❏ Appendix F: [Example Tools + Forms](#)
- ❏ Appendix G: [Other National Resources + Best Practices](#) (NAEH tools, Housing First, RRH + DV, TAY)
- ❏ Appendix H: [San Diego Region Landlord Engagement Models – Side-by-side Chart](#)
- ❏ Appendix I: [Glossary/Definitions](#)