



Housing Program Policies and Procedures Template

Purpose: An effective housing program has policies and procedures that reflect key program decisions about eligible expenses, staff processes, and program approach. This document is meant to be an internal guide and provide clarity about how the program will operate. Clear, accurate policies and procedures allow for all key players in the program to work together as a team with a shared understanding of the program. If a county or tribal agency is working with a local provider to implement the program, this document should be created with their input and shared with the provider staff.

How to Use: As counties and tribal agencies make key decisions about their housing programs, they should use the Housing Program Policies and Procedures Template to record these decisions and create a written record for the program. Each section provides suggested language that can be included in the policies and procedures along with key decision points that counties and tribes need to make about their program. Please note that the suggested language is not complete and needs to be reviewed and edited to be accurate. The intention is that by going through each section, addressing the key decisions, and recording decisions in writing, counties and tribes will have an initial draft of their program policies and procedures.

If a county or tribe is contracting with a 3rd party to implement the program, the county or tribe should solicit some of the information for the policies and procedures through a work plan submitted by the 3rd party. This is especially true for granular processes that the 3rd party will oversee.

This template document was created by the Change Well Project for use by CDSS-funded housing programs and partner agencies. A program using this template should review and make changes based on their specific program criteria. This may include any required approval processes for use by your county or agency. More information about our work is at www.changewellproject.com. This template document may be altered, changed, and reused by CDSS-funded housing programs and partner agencies with no required attribution to Change Well Project.

Housing Program Policies and Procedures
Version (Insert Date)

Contents

Program Overview	5
<i>Program Design</i>	5
<i>Key Roles</i>	6
County/Tribal Agency	6
Contracted Service Provider(s)	7
<i>Program Eligibility</i>	7
<i>Prioritized Households</i>	10
<i>Program Intake and Enrollment</i>	11
<i>Program Funding</i>	11
<i>Key Program Components</i>	12
Housing Support Services	13
<i>Program Outreach</i>	13
<i>Housing Identification and Navigation</i>	14
<i>Housing Stabilization</i>	15
<i>Engagement and Voluntary Services</i>	17
<i>Service Provider Onboarding and Training</i>	17
<i>Connections to Other Services</i>	18
Healthcare, Mental Health, and Substance Use	18
Employment and Income Benefits	18
<i>Housing First</i>	19
<i>Harm Reduction and Trauma-Informed Care</i>	20
Unit Recruitment and Landlord Support	21
<i>Housing Choice</i>	21
<i>Landlord Screening</i>	22
<i>Shared Housing</i>	22
SRO Shared Housing	23
<i>Unit Requirements</i>	24
Rent Reasonableness	24
Debarment Verification	24
Housing Inspections	25
<i>Landlord Supports</i>	25
Landlord Incentives	26

Financial Assistance26

Short-Term and Medium-Term Rental Assistance.....27

Connecting to Other Housing Assistance Resources.....28

Standard Leasing29

Separation of Financial Assistance and Services29

Program Exit.....30

Program Termination.....30

Grievance Procedure.....31

Requisition Process32

Data Collection Requirements32

HMIS and Comparable Database.....32

Client Files33

Contract Monitoring33

Affirmatively Furthering Fair Housing34

Anti-Discrimination Policy and Equal Access34

Appendix I: Referral, Eligibility Verification, and Prioritization Tool35

Appendix II: Eligible Expenses.....35

Appendix III: Client File Checklist.....35

Appendix IV: Participant Housing Plan35

Appendix V: Determining Household Rental Contribution35

Appendix VI: Client File Checklist35

Appendix VII: Contract Monitoring Tool.....35

Program Overview

The Program Overview section should provide a high-level overview of the context and goals of the housing program. In addition, subsections should also explain the basics of program design, key agencies involved in program implementation, eligibility rules, prioritization strategies, program intake and enrollment, funding sources for the program, and key components that will be offered to participants. Visuals can be very helpful to include along with narrative explanations (ex. A figure of the program process map paired with a narrative explanation of each step to provide more information).

This first section provides a brief history of the program, the local context that illustrates the need for the program, and the overall goal of the program.

Suggested Language for Section:

In FY 2021-22, following the crisis of COVID-19 and the increase in people experiencing homelessness in California, the California Department of Social Services (CDSS) announced increased funding available for core housing programs: CalWORKs Housing Support Program (HSP), Bringing Families Home (BFH), Housing and Disability Advocacy Program (HDAP), and the Home Safe Program. CDSS provided the increased funding to expand existing housing programs in the state and allow for new programs to be established in counties and tribal communities.

Key Decision Points to Include

- Describe the history of when the funding was accepted by the county or tribal community and how much the county/tribe received for programs.
- What is the overall landscape of homelessness in your community? How will this program aim to impact housing crises for the eligible population? Your local CoC should have data on the population experiencing homelessness in your community.

Program Design

This section should provide a high-level overview of the program design beginning with outreach and intake through providing housing supports and services. As you explain the process map be sure to include what agency and/or staff oversees which step.

Suggested Language for Section:

CalWORKs HSP, BFH, HDAP, and Home Safe programs share a model of providing housing supports, both rental assistance and supportive services, to eligible households who are also receiving core social services from county programs (see chart below). Housing supports provided by the programs are to be flexible to address the needs of each household and may be provided to prevent a household from losing their housing, rehouse a household who is in an unsafe or unsustainable location, and/or end an episode of homelessness for a household. Counties and tribal communities may administer the program internally or contract with a 3rd party to carry out part or all the program components.

Program	CalWORKs HSP	BFH	HDAP	Home Safe
Core Service	CalWORKs Benefits	Child Welfare Interventions and Family Supports	Benefits Advocacy	Adult Protective Services Interventions and

Commented [EF1]: or tribal equivalent. Not to self to ask Whitney what we landed on.

				Supports or Tribal Equivalent
Housing Supports Provided	<ul style="list-style-type: none"> • Case Management • Housing Stabilization • Housing Identification • Rent and Move-In Assistance 	<ul style="list-style-type: none"> • Housing Related Case Management • Housing Stabilization • Housing Navigation • Direct Housing Financial Support 	<ul style="list-style-type: none"> • Outreach • Intensive Case Management • Housing Stabilization • Housing Navigation • Direct Financial Assistance • Care Coordination 	<ul style="list-style-type: none"> • Intensive Case Management • Housing Stabilization • Housing Navigation • Direct Financial Assistance • Connection to Long-Term Supports

Housing supports provided by counties and tribal communities through CDSS-funded programs use a rapid rehousing approach where households are provided with short- and medium-term rental assistance, support services, and housing navigation assistance. Counties and tribes work in conjunction with local homeless and housing systems to identify long-term rental assistance and services if needed by households.

Key Decision Points to Include
<ul style="list-style-type: none"> • Will the county/tribal agency contract with a local provider to do some or all the program components? How will the county/tribal agency identify the local provider? • Include the housing program process map in this section that provides an overview of the program. This section should include the process map AND a narrative explaining each step of the process map with key information for that step.

Key Roles

This section will clearly define the major entities that are partnering to administer the housing program. As partners are identified, the policies should state the main responsibilities they have for the program and what components of the program they will administer. If you are using contracted service providers to administer some or all the program components, they need to be named under the Contracted Service Provider section.

County/Tribal Agency

Suggested Language for Section:

(County/Tribal Agency Name) receives funding from CDSS Housing and Homelessness Division (HHD) to administer the housing programs. These funds will be overseen by the Department of (name of department here). As the administrator of funds, the Department will provide oversight of spending and ensure that the program meets reporting and regulatory requirements set forth by CDSS. Additional administrative roles include...

In addition to program management and oversight, (County/Tribal Agency Name) will oversee several components of the housing programs. These include ...

Key Decision Points to Include
<ul style="list-style-type: none"> • What are the oversight tasks that the county/tribal agency will do to ensure the program is running according to these policies and procedures? • What programmatic tasks will the county/tribal agency perform? What department or offices will oversee these tasks? • How will the county/tribal agency monitor spending for the program? • What strategies (regular meetings, reports, etc.) will the county/tribal agency use to complete these tasks? Remember to keep this at a high level so you have the flexibility to change strategies without having to edit this document.

Contracted Service Provider(s)

Suggested Language for Section:

To provide vital components of our program, (County/Tribal Agency Name) is contracting with (Contracted Service Provider(s)) to...

Key Decision Points to Include
<ul style="list-style-type: none"> • For each contracted service provider, name the programmatic tasks that they will be responsible. • What reporting will the contracted service providers be responsible for?

Commented [RW2]: Do we want to indicate here as well that they may contract for benefits advocacy for HDAP separately from housing supports contracting?

Program Eligibility

This section should explain the eligibility requirements for the housing program. Please note that there is a separate section to explain how households will be prioritized for receiving housing supports. Eligibility policies the criteria used to define who is potentially eligible for the program, while prioritization policies detail who out of the eligible population will most likely be served and/or expedited to be served by the program.

Provide all eligibility criteria and be sure to note how they are related to each other (ex. households need to meet 3 out of 4 eligibility criteria). We recommend that a community include forms created to verify eligibility for the program as an appendix to the policies and procedures.

Suggested Language for Section:

Eligibility for the housing programs is outlined by CDSS in the All-County Welfare Directors Letters (ACWDLs) for FY 2021-2022. For all housing programs, the household must be eligible for the core service provided by the county AND meet a qualifying housing status.

Commented [RW3]: As it is so frequently confused, we may want to include a sentence or two that explains the difference between "eligibility" and "prioritization among eligible clients"

Program	Core Service Eligibility Requirement	Housing Status Eligibility
CalWORKs HSP	All CW eligible households, including but not limited to:	Households who are experiencing homelessness or

	<ul style="list-style-type: none"> • Welfare-to-Work • Exempt • Child only • Safety Net (child only where parent hit lifetime limit) • Sanctioned • CW Family Reunification AB 429 • CalLearn 	at risk of homelessness including recipients who have not yet received an eviction notice, and for whom housing instability would be a barrier to self-sufficiency or child well-being.
Bringing Families Home	<p>Biological parents, guardian, or kinship guardians (e.g., applicable grandparents) who receive child welfare services at the time eligibility is determined AND voluntarily agree to participate in the program. Child welfare service component types include but not limited to:</p> <ul style="list-style-type: none"> • Family Reunification • Family Maintenance • Emergency Response services • Families in receipt of voluntary supervision to prevent the need for the child's or children's removal. 	Households who are experiencing homelessness or at risk of homelessness.
HDAP	<p>Households who have a member that is likely eligible for disability benefits. This may include youth and families with adults or children who are eligible for disability benefits.</p>	Household who are chronically homeless, homeless, or at risk of homelessness including adults exiting jails/prisons/correctional facilities, hospitals, or other institutions.
Home Safe	<p>Is an adult protective services client or is in the process of intake to adult protective services or is an individual who may be served through a tribal social services agency who appears to be eligible for adult protective services AND voluntarily agrees to participate in the program.</p>	Household is homeless or at imminent risk of homelessness as a result of elder or dependent abuse, neglect, self-neglect, or financial exploitation, as determined by the adult protective services agency or tribal agency.

Eligible living situation requirements are defined in more detail below:

Eligible Homeless Living Situations:

- Currently experiencing homelessness by living on the street, shelter, in a place not meant for human habitation;
- Exiting an institution after less than 90 days and was homeless at entry; OR
- Fleeing or attempting to flee domestic violence, sexual assault, stalking, human trafficking, or an unsafe living situation

At Risk of Homelessness Living Situations:

If at risk of homelessness, households must meet one of either the HUD criteria OR one of the California program specific criteria outlined below to receive housing and/or prevention resources.

HUD Criteria
<ul style="list-style-type: none">• Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance;• Is living in the home of another because of economic hardship;• Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;• Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals;• Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room;• Is exiting a publicly funded institution or system of care; OR• Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.
HSP/BFH/HDAP Additional Criteria
<ul style="list-style-type: none">• Families experiencing housing instability, including recipients who have not yet received an eviction notice, AND for whom housing instability would be a barrier to self-sufficiency or child well-being<ul style="list-style-type: none">○ Have no subsequent permanent residence secured, AND○ Lack resources or support networks needed to stabilize their unique housing situation and secure subsequent permanent housing.
BFH ONLY Additional Criteria
<ul style="list-style-type: none">• Families where the living situation cannot accommodate the child or multiple children in the home<ul style="list-style-type: none">○ the parent or guardian's nighttime residence would not be an adequate or appropriate long term housing placement for a child or children due to living situations that jeopardize the physical health, mental health, safety and/or wellbeing; AND○ have no subsequent permanent residence secured, AND;○ lack resources or support networks needed to stabilize their unique housing situation and secure subsequent permanent housing.

Home Safe ONLY Additional Criteria

- A person who has received a pay rent or quit notice or who will otherwise imminently lose their primary nighttime residence, which may include individuals who have not yet received an eviction notice, if all of the following are true:
 - The right or permission to occupy their current housing or living situation will be, or there is credible evidence that it will be, terminated within 21 days after the date of application for assistance **AND**
 - A subsequent residence has not been identified or secured, including, but not limited to, an individual exiting a medical facility, long-term care facility, prison, or jail **AND**
 - The individual lacks the resources or support network, including, but not limited to, family, friends, or faith-based or other social network, needed to obtain other permanent housing.
- A person who has a primary nighttime residence or living situation that is either directly associated with a substantiated report of abuse, neglect, or financial exploitation or that poses an imminent health and safety risk, and the person lacks the resources or support network needed to obtain other permanent housing.

In addition, households must have very low-income status to be eligible for housing supports through prevention. Households meet the low-income criteria by either:

- Being eligible or receiving any of the following benefits: CalFresh, CalWORKs, General Assistance/General Relief, Medi-Cal, Supplemental Security Income (SSI)
- Household income is 30% of Area Median Income or less

Key Decision Points to Include

- How will eligibility be determined? Who will determine eligibility for the housing program?
- Is there additional detail needed here to explain who will be determined to be eligible under these rules?

Prioritized Households

This section should explain any prioritization decisions you have made about your program. In other words, of the eligible households who is prioritized in your program. Households may be prioritized in order to determine who will be served and/or how quickly they will be served. We recommend that a community include forms created to prioritize eligible households for the program as an appendix to the policies and procedures.

Suggested Language for Section:

To ensure resources for those households most in need, (County/Tribal Agency Name) created the following prioritization policies.

Key Decision Points to Include

- What are you prioritizing? At the beginning of a program when you have more resources, you may want to prioritize some households to be served more quickly than others. As programs continue and resources are used, you will need to determine who will be prioritized to be

Commented [RW4]: I don't know that grantees are permitted to add additional eligibility criteria per se. They can build a specific prioritization plan, but CDSS has said that they are not permitted to create new restrictive eligibility criteria. Maybe instead say "Is there additional detail needed here to explain how individuals will be determined to be eligible under these rules?"

served. Some programs that do not have enough resources to meet the community need from the start, should prioritize households so that those needing the most support are served first.

- Who are you prioritizing? Communities can make this decision in several different ways. We recommend looking at your current program data and local homelessness data to ground your decisions in real numbers. You can prioritize households who are members of specific subgroups (i.e., households with no income) and/or you can rank households by how many different barriers they face with their housing crisis (i.e., history of eviction, use of the emergency room in the last 12 months, large number of people in the household).
- How will you monitor the prioritization process to ensure that you are not inadvertently denying access to protected classes (i.e., race, age, disability status, etc.)?
- Who will determine if a household is prioritized for the program?
- What will happen to households who are not prioritized for the housing program? Will staff serve them in another way?
- If prioritization needs to be changed in the future, what is the process for making changes to the policy? Who needs to approve such changes?

Program Intake and Enrollment

This section should provide a narrative overview of the program's intake and enrollment process. We recommend including an image of a process map to provide a visual along with the narrative. The sections should include how households will be referred to the program, the program will outreach to find eligible households, the program confirms eligibility, and the household will be enrolled in the program. For each step of the process, the section should include the required documentation and what staff are responsible.

Key Decision Points to Include

- Will the intake and enrollment process include the county/tribal agency and the local provider? How will the transfer of information happen between parties?
- Will your program include time requirements for how quickly a household will be followed up with after referral, eligibility confirmation, and/or intake?
- Include the county/tribe process map for program intake and enrollment in this section that provides an overview of the process.
- We recommend that programs have participants sign an authorization to share information at intake that enables the program to easily share information with local partners who are also providing on going supports to the participant.

Program Funding

This section should provide an overview of the funding that is being used to support the housing program. If multiple funding sources are used, clarify if a source of funding has restrictions such as limitations on eligible expenses or populations that can be served.

Suggested Language for Section:

(County/Tribal Agency) is utilizing the funding streams listed below to support the housing program. (County/Tribal Agency) will assist designing and implementing funding processes to ensure it meets state and local regulations and to maximize the ability to leverage resources. Where possible, funding will be used to ensure that all households who are eligible for the housing program will have access to the same menu of services.

Program	Funding for FY 21.22	Funding for FY 22.23
CalWORKs HSP		
Bringing Families Home		
Housing & Disability Advocacy Program		
Home Safe		
Project Room Key		
Other 1		
Other 2		
Other 3		

Key Decision Points to Include
<ul style="list-style-type: none"> • What agency will oversee all reporting requirements are met for each source of funding? • What agency will ensure that the use of funds meet state and local regulations? • Will your community use multiple funding streams to implement one housing program?

Key Program Components

This section provides a brief overview of the main program components included in the housing program. The policies and procedures will provide more in-depth information about these components in the sections that follow.

Suggested Language for Section:

(County/Tribal Agency Name) will assist eligible households with obtaining and maintaining housing by offering a comprehensive program model made up of the following key components:

- Housing Navigation Services – assistance to find and move into housing including unit recruitment and landlord retention activities;
- Rental Assistance– financial support for short and medium-term rental assistance and associated housing costs; and
- Housing Support Services– services to help families stabilize in housing

See below for a more detailed description of these key components.

In addition, for households eligible for HDAP, the (County/Tribal Agency Name) will also provide benefits advocacy and care coordination to complete benefit program applications.

Key Decision Points to Include
<ul style="list-style-type: none"> • Are there other key components you would like to list in this section? If you add additional program components, be sure to add an additional section to the program policies and procedures to provide more detail about it.

Commented [RW5]: I'll bring it up in our conversation, but I know we have talked about creating a Benefits Advocacy specific policies & procedures. I wonder instead of a different document entirely, we create specific "add ons" to the P&P for benefits advocacy

Housing Support Services

The Housing Support Services section of the policies and procedures should provide more detail about all the services provided to program participants to help them access and keep housing in the community. This section helps to define the services provided, who will provide them, how they will be provided, training staff will receive to be able to provide services, and what approaches the program will utilize. By providing thorough information, this document can be used to onboard contracted local providers and/or new program staff.

Program Outreach

Program outreach is a required component of the Housing and Disability Advocacy Program (HDAP) and is good practice for all CDSS funded programs. This section details how the program will locate eligible households for the program. This section should include any community partners who help to identify eligible households and any staff activities done to identify and engage eligible households. We recommend replacing the generic names in the suggested language to the actual names of those agencies the housing program works with.

Suggested Language for Section:

To ensure that eligible households access the housing program, (County/Tribal Agency) conducts community-based outreach about the availability and services provided under each of the CDSS programs. These outreach activities include but are not limited to:

- Regularly updated program information listed on the website
- Regular training regarding eligibility for each program and program materials made available for the following local partners:
 - Street based outreach teams
 - Local Continuum of Care members
 - Tribal Partners
 - Other County departments
 - Employment & Eligibility Programs
 - Behavioral health providers
 - Health Services providers
 - Other community-based providers
 - Regional centers
 - Faith based organizations
 - First 5
 - Legal aid organizations
 - Federally Qualified Health Centers
 - Indian Health Care organizations
- Accessible referral process that local partners may use to refer eligible community members to the program and check on status of referrals

(Identified housing program staff) regularly provides program materials, makes presentations about the housing program, and attends community meetings to educate and coordinate referrals for the housing program. As households are referred, (identified housing program staff) will meet with them to verify eligibility and initiate the enrollment and intake process.

Commented [RW6]: We may want to include an additional bullet to say "Referral process created so that local partners may easily refer eligible community members to your program and check on status of referrals." We may also want to call out here that it is good practice for them to have participants sign an authorization to share information at intake that enables the program to easily share information with local partners who are also providing on going supports to the participant.

Commented [EC7R6]: Added to the points to consider in Program Intake and Enrollment

Key Decision Points to Include

- Does your program work with all the listed community partners in this section to identify eligible households? If not, how will you begin to build relationships with these partners.
- Who will be the primary staff responsible for outreaching and coordinating with partners? We recommend not assigning this responsibility to program case managers who need to focus on providing services to their case load.

Housing Identification and Navigation

This section details the services provided to program participants as they look for housing in the community. The section should include information about what services are available to households, what staff will be responsible for providing those services, and how the services will aid households in accessing units.

Suggested Language for Section:

Program case managers and housing navigators will work in partnership to place households in housing. Case managers will assist households in obtaining the necessary identification and documentation to apply for units on the fair market. In addition, case managers will assist households to prepare documentation to be eligible for other permanent housing programs available in the community and through the CoC's Coordinated Entry system.

As households are enrolled in the housing program, the housing navigator and case manager will work with the household to identify their housing needs and wants. The assigned housing navigator will locate available units in the community. The housing program will recruit units using landlord recruitment strategies described below. If a household or case manager identifies an available unit, the case manager will coordinate with the housing navigator to ensure the landlord is a viable option for financial assistance. The program's goal will be to fill units within one month of being recruited into the program.

Housing navigators will assist households in identifying their housing preferences and offer the same range of choices in units as are available to others at their income level in the same housing market. Housing navigators will assist the household in viewing the unit, completing a rental application, and coordinating the lease signing. In addition, housing navigators will assist the household with scheduling and paying for unit move-in. Case managers will assist by identifying furniture and household items needed to make the new house a home for the household and connecting households to donations and other resources to get these needs met.

Housing Search and Placement Activities	Program Staff Responsible
Obtain documentation such as state ID or social security card for housing applications	Case Manager
Complete applications for other permanent housing programs in community	Case Manager
Recruit units for housing program	Housing Navigator
Deploy Landlord Incentives	Housing Navigator
Determine household needs for units	Case Manager and Housing Navigator
Identify available units that meet household needs	Housing Navigator
Arrange for viewing of units	Housing Navigator
Complete rental applications	Housing Navigator

Complete HAP agreement and facilitate execution of lease and required addenda	Housing Navigator
Assist with setting up utilities for unit	Housing Navigator
Arrange for moving services if needed	Housing Navigator
Identify resources for furnishing and home goods	Case Manager
Initial income certification and ongoing income certifications	Case Manager
Regularly checking in with landlord to help resolve issues threatening tenancy	Housing Navigator
Assist with HAP and lease renewals	Housing Navigator

Key Decision Points to Include
<ul style="list-style-type: none"> • Will your program have specialized staff to provide housing navigation services? If the program does have specialized staff, it is important to use the chart in the suggested language section to differentiate what activities the case manager will do for a household vs. what activities the housing navigator will be responsible for. Please be sure to edit for accuracy with your program design. • If you are contracting with a local provider to provide these services, we recommend working collaboratively with them to ensure that these policies and procedures are feasible and do not create unnecessary barriers for the program staff.

Housing Stabilization

Case management is a required component of CDSS funded programs and is related to the household's housing stability and separate from the other case plans required for CalWORKs, Child Welfare investigations, benefits advocacy and/or APS investigations. While the respective case managers will need to case conference to avoid duplication of services and to streamline case plans, the housing case manager will focus on obtaining and maintaining housing.

This section provides details about how the program will provide services to program participants to stabilize the household in permanent housing. The section should include what types of services will be provided, what staff will be providing the services, case ratios for this staff, and frequency of visits. In addition, the section needs to clearly state that all services are voluntary for program participants.

Suggested Language for Section:

As households are enrolled in the housing program, case managers will support the households in obtaining and maintaining housing. Households will receive the voluntary housing support services until they are exited from the program. Services will be offered to meet the needs of each specific household.

The focus of housing support services will be to maintain and sustain housing. Case management will prioritize assisting households to establish a household, meet the obligations of tenancy (such as paying rent on time), and get along with neighbors and the landlord. Households will determine what supports they need to meet these housing goals. Case management will be provided in home at a minimum of once per month or more frequently in accordance with the household's needs. Participants with multiple housing barriers may need intensive case management with more frequent support, once or more per week.

Support can be tailored to the participants' needs as they stabilize in housing. As needs change over time, tenants will receive more intensive or less intensive support services without losing their homes. Whenever possible, households will direct when, where, and how often case management meetings occur. Meetings will occur in a participant's home and/or in a location of the participant's choosing.

Case managers will provide information about an array of services that might fit a household's needs. Case managers will work to develop a working familiarity with the local systems and resources with which households often must interact and facilitate connections with those systems, including healthcare facilities, food assistance programs, childcare, etc. In addition to formal systems, case managers will support participants who indicate interest in restoring their natural support systems or helping to establish new community connections to support long-term goals and foster healing.

Ongoing housing support services are not dependent on the housing status of a household. In the unfortunate event that a household is evicted from a unit, they can continue receiving services and be rehoused. In addition, if the tenant refuses services or the case manager terminates services, the tenant can remain in housing as long as they are not terminated from the program. Case managers will continue to engage households in services if they refuse services and will continue to support households with collecting documentation needed for the continuation of rental assistance.

List of Potential Housing Support Services

- Assisting with budgeting for housing/living expenses
- Assisting the enrollee to develop a housing support and crisis plan to support living independently in their own home
- Assisting the enrollee to develop a housing stability plan and support the follow through and achievement of the goals defined in the plan.
- Supporting the enrollee in the development of independent living skills.
- Connecting the enrollee to education/training on tenants' and landlords' role, rights and responsibilities.
- Assisting the enrollee in reducing risk of eviction with conflict resolution skills.
- Assisting with other needs as identified by the household to stabilize their housing

To provide high quality services to program participants, the program will limit assigned household to case manager ratios to 1:35 for case management and 1:20 for intensive case management. Where possible, the housing program will work with the case management team to ensure their assigned caseload allows them to meet the needs of the households they are working with.

Key Decision Points to Include

- How will your program determine the intensity of services that a household needs? Will this be tracked over time to assist case managers in tailoring services and tracking a household's progress in the program?
- Case management ratios provided are from CDSS guidance. Does your program meet these ratio limits? If not, do you need to add staff to come into compliance?
- Will your program use a specific tool to create a housing plan with participant households? We recommend including the tool as an appendix and creating policies about when the plan is created and how often the plan is reviewed with households to track progress on goals.

Engagement and Voluntary Services

As a housing first program, services are voluntary and program staff need to focus on continually engaging households in services to secure their housing. This section expands on how services will be offered voluntarily and how households will be engaged in services. We recommend that case managers use the Housing Program Participant and Case Manager Agreement Template to develop strong partnerships.

Suggested Language for Section:

Following a Housing First model, the housing program's services are voluntary, and a household cannot be terminated from the program for rejecting services. Case managers will focus on engaging households to develop a strong partnership in creating housing plans.

Households will lead the case planning and goal setting based on what they want from the program and services. Case managers will ensure that they provide information about the array of services available to the households to develop a comprehensive housing plan. Each household will receive different types of services based on their needs and preferences. Case managers will use the program's Program Participant and Case Manager Agreement to strengthen the partnership between program participants and their assigned case managers.

If a participant refuses case management services, the case manager will...

Key Decision Points to Include

- What will the program do if a participant refuses services from their case manager? Should the case manager report the issue to a specific supervisor? Possible options are the household being reassigned to another case manager, a meeting with the participant, case manager, and supervisor to discuss issues, and/or meeting with the participant and supervisor to discuss goals with the program.

Service Provider Onboarding and Training

This section provides an overview of the training that housing program staff will receive. Training should be provided to not only case managers but also housing program administrators to ensure there is a common understanding about program operations. The section should include a list of training topics and how frequently trainings need to be completed. If the county/tribal agency is contracting with a local provider, the section needs to clarify which agencies will attend the training. We recommend utilizing the Change Well learning platform and trainings as a free resource to cover many of these training topics.

Suggested Language for Section:

Training for housing program staff will be available and encouraged. (County/Tribal Agency) plans to partner with their local housing providers and other technical assistance providers to provide a full range of trainings on best practices in housing support services.

At a minimum program staff will have training on the following topics when hired and ongoing on an annual basis:

- Requirements of all funding streams and eligible expenses
- The principles of Housing First and how that impacts service provision

- Landlords’ perspectives, landlord and tenancy rights and responsibilities, and negotiating landlord supports
- The ethical use and application of a program’s financial assistance policies, including, but not limited to, initial and ongoing eligibility criteria, program requirements, assistance maximums
- Social Security Disability Insurance and Supplemental Security Income enrollment procedures
- Other benefit programs and their enrollment procedures
- Local housing programs including CoC resources
- Harm Reduction and Trauma-Informed Care

Where possible, program staff will maintain documentation to show that each newly hired program staff and case manager have completed required trainings for onboarding and ongoing required trainings. The (County/Tribal Agency) is responsible for keeping staff regularly updated on changing regulations and/or program policies through regular oversight and technical guidance processes.

Key Decision Points to Include
<ul style="list-style-type: none"> • Does the county/tribal agency require any additional training for staff or contracted providers that need to be included in this section? • Are there specific local trainings that you want to require staff to attend? • Are training costs included as an eligible expense for the program? If not, how will program staff cover this cost?

Connections to Other Services

Many program participants will require additional service systems to address their housing needs. This section includes information about how the housing program will coordinate with key systems to ensure households have access to services.

Healthcare, Mental Health, and Substance Use

Suggested Language for Section:

To assist program participants in maintaining their housing, case managers will assist in coordinating care with health, mental health, and substance use services as needed. All service coordination will be voluntary unless a member of the household discloses to housing program staff that they will harm themselves or others.

To access healthcare services, case managers will...

To access mental health services, case managers will...

To access substance use services, case managers will...

Employment and Income Benefits

Suggested Language for Section:

To maintain housing, households will need to be able to afford paying ongoing rent. One strategy to assist program participants with meeting this need is to increase the household income. Case managers will assist households in accessing and applying to all earned income programs to return to work or change current employment. In addition, case managers will assist households to apply for cash benefits

that the household wants and is eligible for. These programs include: *(insert list of specific vocational programs and income benefits)*

Case managers will assist households in obtaining all necessary documentation to apply for these programs.

Key Decision Points to Include

- Are there additional service systems your program will coordinate with? If so, add subsections to include information that is important to the housing staff.
- It is important to provide local specifics where possible in these sections to assist program staff in understanding how they will coordinate with other service systems.
- How will your program refer clients to specific providers? Will it be a formal or informal process?

Housing First

This section defines the housing first approach for the program and describes how this approach will be utilized in the housing program. CDSS requires that all programs operate as housing first.

Suggested Language for Section:

As stated earlier, the housing program is a program that adheres to a Housing First approach. Wherever possible, the (County/Tribal Agency) will work to remove any arbitrary programmatic requirements to ensure meaningful engagement with households that leads to permanent housing. The housing program will:

- Honor people's choices
- Eliminate requirements for entry (sobriety, mental health treatment, too little income)
- Eliminate participation requirements once housed (sobriety, medication or treatment compliance, services)
- Move people into housing first and then provide them the services they want/need
- Provide encouragement and engagement to households but does not require services

The (County/Tribal Agency) will seek out households with severe service needs and accept referrals from the community for permanent housing assistance. The program does not screen out for:

- Having too little or no income
- Active substance abuse or history of substance abuse
- Having a criminal record
- History of domestic violence (e.g., lack of protective order, or separation from abuser, or law enforcement involvement)

The (County/Tribal Agency) will also ensure that participants are not terminated from the program for the following reasons:

- Failure to participate in supportive services
- Failure to make progress on a service plan
- Loss of income or failure to improve income

Commented [RW8]: If we want them to include a list of specific income benefits?- maybe we should put an explainer in parenthesis here? We also could include general language about coordinating with vocational programs available for those who wish to change work or return to work

Commented [RW9]: Would another key decision point here (and really also for other connecting pieces)-- "Will your program create a formalized process for referring clients for to specific service providers or will this be an informal process?"

Commented [RW10]: maybe "too little or no income" (because they can screen out based on too much income)

- Domestic violence
- Any other activity not covered in a lease agreement typically found in California
- Failure to maintain recovery

Key Decision Points to Include

- Does your program meet the requirements listed in the suggested language section? We recommend reviewing processes and forms to ensure that households are not being excluded or terminated from the program for the reasons listed above.
- Does county/tribal agency leadership understand housing first policies? Do they also need training in the housing first approach?

Harm Reduction and Trauma-Informed Care

In addition to housing first, services should be offered using harm reduction and trauma-informed care approaches. This section should define what these approaches are and how they will be utilized in the housing program.

Suggested Language for Section:

Housing program staff will be trained and expected to use both harm reduction strategies and trauma-informed care when providing services to households.

Harm reduction assists in engaging vulnerable populations often reticent to seek or accept assistance. Housing program staff use the harm reduction approach to:

- Take a non-judgmental approach
- Provide opportunities for services and housing without requirements
- Honor people’s choices
- Foster the development of trusting relationships
- Offer encouragement and alternatives to harmful behaviors

Most people experiencing homelessness have at least one but often multiple traumatic events prior to their first homeless event. Trauma-informed services ensures that a person:

- Feels safe
- Has control over their choices
- Plays a significant role in planning their services
- Trusts, as much as possible, the process and the person with which they work
- Identifies their strengths to feel empowered

Housing program staff including case managers, housing navigators, and program leadership staff will be trained in providing all services using a trauma-informed approach.

Key Decision Points to Include

- Does your program meet the requirements listed in the suggested language section? We recommend reviewing processes and forms to ensure that households are not being excluded or terminated from the program for the reasons listed above.
- Does county/tribal agency leadership understand harm reduction and trauma-informed care? Do they also need training on these approaches?

Unit Recruitment and Landlord Support

The Unit Recruitment and Landlord Support section provides details about how landlord engagement and unit recruitment will be done for the housing program. If there is a community effort to recruit units on behalf of all housing programs in the community, we encourage you to join that system and explain how that will work in this section. In addition, this section will detail the requirements for participating landlords and units receiving rental assistance.

Suggested Language in Section:

(Name of Agency Responsible) has the primary responsibility for outreach to landlords and identifying rental units for program participants. They will be the primary point of contact for landlords and property managers who are participating in the housing program. If necessary, *(Name of Agency Responsible)* will provide landlord incentives to increase access for households who face systemic barriers to renting units (i.e., no rental history, history of eviction, poor credit, criminal records, etc.). *(Name of Agency Responsible)* staff will ensure the unit meets program standards, assist with coordinating inspections, coordinate lease signing, and support the landlord with timely rental payments.

Key Decision Points to Include

- What agency and/or staff will be responsible for recruiting and building relationships with landlords? We recommend that landlords have a direct contact that manages any issues that arrive.
- Will your program provide landlord incentives? If so, you can detail those types of incentives below.

Housing Choice

This section affirms that the housing program is a person-centered program that, when possible, provides a range of choices for program participants to choose from. If your program has certain policies about how many choices are offered to participants, include those policies in this section.

Suggested Language in Section:

The goal of the housing program is to find housing options that are appropriate and meet the needs of households in the program. Housing navigators will assist households in identifying their housing preferences and offer the same range of choices in units as are available to others at their income level in the same housing market. Housing navigators and households will consider the size of the unit, location, and cost of rent when deciding on a unit.

Housing navigators will work in partnership with case managers to find the best housing option for a household. If a household or case manager identifies an available unit, the case manager will coordinate with the housing navigator to ensure the landlord is a viable option for financial assistance.

The housing program will honor client choice for unit selection if the housing meets program requirements and landlord is willing to accept financial assistance. When needed, the housing navigator will utilize available landlord incentives to assist a household in gaining access to a unit.

Key Decision Points to Include

- Will you have specialized staff to do outreach to landlords? We recommend specializing this position so that case managers are not managing these duties on top of other responsibilities.
- What title will the specialized staff have? Above, we use housing navigator.
- We recommend that staff recruit units for the housing program on an ongoing basis to ensure each participant household has choices in where to live.
- Programs should have policies as to how participants or case managers can identify units and pass the information to housing navigators to follow up.

Landlord Screening

This section should outline the requirements for screening landlords who wish to participate in the housing program. The screening process can consider past experiences of participants with the landlord and other information about the landlord previously not adhering to legal responsibilities of being a landlord or violating fair housing law.

Suggested Language for Section:

Where possible, housing navigators will collaborate with case managers and other housing providers to identify and screen out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices. In addition, the housing navigator will document program participant complaints against landlords to screen out potential landlord partners for lack of compliance with legal responsibilities and fair housing practices.

If a landlord has a history of any of the following, they will not be allowed to participate in the housing program: *(insert list of specific reasons to exclude landlords)*

Key Decision Points to Include

- What specific complaints or behavior will your program screen out landlords from participating in the program?
- How will staff document and keep track of landlords that are not able to participate in the program?
- Will you provide a way for landlords to respond to determinations that they are not able to participate in the program?
- Do you have local fair housing programs that can assist you in identifying landlords that continue to violate fair housing law?
- Do housing programs in the community also screen landlords? How can you coordinate with these programs?

Commented [RW11]: I think here some visual indicator that they are asked to create a list

Shared Housing

This section details how program participants can utilize shared housing arrangements (roommates) to make housing more affordable. If the housing program is using a guideline for rental assistance like Fair Market Rent (FMR), this section needs to explain how shared housing impacts the calculation of FMR. The suggested language provided reflects how shared housing impacts HUD calculations for FMR.

Suggested Language for Section:

Shared housing is a situation in which multiple households have private bedrooms but share common areas, sanitary facilities, and cooking facilities. If the housing program is placing a client in shared housing, FMR will be calculated using the following policy.

In most shared housing situations, Fair Market Rent (FMR) for a household in shared housing is the pro-rata share of the FMR for the shared housing unit size.

- The pro-rata share is calculated by dividing the number of bedrooms available for occupancy by the assisted household in the private space by the total number of bedrooms in the unit.
- The utility allowance for an assisted household living in shared housing is the pro-rata share of the utility allowance for the shared housing unit.
- FMR and utility allowances should be calculated in this way for all shared housing situations, except those that meet the criteria to be classified as SROs (which are outlined below).

Regular shared housing FMR calculation example:

Scenario 1: Three-bedroom house, three adult roommates, all housing program clients. In this case, the full unit rent must be within the allowable three-bedroom FMR for the county and the utility allowance for each client is the three-bedroom utility allowance divided by 3.

Scenario 2: Three-bedroom house, only one bedroom occupied by a housing program household. If this unit is in XXXX County, the three-bedroom FMR is \$XXXX for a three-bedroom unit. The client's allowable FMR is \$XXXX divided by 3 or \$XXX. The client's utility allowance is the three-bedroom utility allowance divided by 3.

In a shared housing arrangement, program participants will be required to...

Key Decision Points to Include

- Will your program use FMR or another gauge to determine rental rates that can be provided by the program?
- Will you require additional policies around shared housing? For example, many programs require that each participant household have their own lease so if one moves out of the unit, the other households can maintain their lease.
- Will your program match program participants in shared housing or rely on program participants to locate their own roommates?

SRO Shared Housing

This section clarifies the difference between a shared housing situation in a multi-bedroom unit (described above) and a shared housing situation in a Single Room Occupancy (SRO) unit, otherwise known as renting a room. This section should include the impact of an SRO rental on rental assistance requirements, such as FMR, and any other policies around the use of SROs by the program. The suggested language provided reflects how SROs impact HUD calculations for FMR.

Suggested Language for Section:

In limited circumstances a shared housing situation may instead use the SRO FMR. To qualify as an SRO, the shared housing situation must have the following characteristics:

- There is only one person per bedroom.
- Each household holds a separate lease.
- All bedrooms in the housing unit must qualify as SROs. E.g., There's a four-bedroom house in which one household holds a separate lease but two households share leases for multiple bedrooms, none of the units qualify as SROs. Or if one bedroom has multiple people living in it, none of the bedrooms qualify as SROs.

The SRO FMR is 75% of the efficiency (aka 0 bedroom) FMR and the utility allowance is 75% of the efficiency (0 bedroom) utility allowance.

Key Decision Points to Include
<ul style="list-style-type: none"> • Will your program use FMR or another gauge to determine rental rates that can be provided by the program? • Will you require additional policies around SRO rentals? • You may want to consider working with a landlord that would allow you to master lease SROs in your community to be able to move participants into housing quickly.

Unit Requirements

This section provides detail on the standards that your program will require for units to receive rental assistance. CDSS funding does not require any standards for units. However, these policies provide safeguards for your housing program to determine that the rental rate you are paying is fair, payments are being made to the correct landlord or property manager, and that the housing unit meets quality standards. Your program may also require additional standards. However, the program should ensure that the standards do not create undue burden on the landlords and inhibit their participation in the program. If you are blending CDSS funding with other types of funding, be sure that all requirements from the other funding streams are accounted for.

Suggested Language for Section:

A vital part of housing navigator services is locating available, affordable units in the community for eligible households. All units that will be used for the housing program must have:

1. Passed HUD Housing Quality Standards (HQS) inspection
2. Fair Market Rent (FMR) and Rent Reasonableness check
3. Debarment check

Rent Reasonableness

The housing program will conduct a rent reasonableness check to ensure that program rents being paid are reasonable in relation to rents being charged for comparable unassisted units in the area. To determine whether a unit meets this standard, the housing navigator will conduct and document a review prior to executing the lease for an assisted unit and anytime unit rent is increased thereafter. At minimum, no less than three comparable units will be used to complete the rent reasonableness review.

Debarment Verification

The housing navigator will also verify the property's ownership and check the names of the ownership and property management entities against federal and State of California debarment databases.

Housing Inspections

To give households the greatest access to affordable housing programs in the community, the housing program will use HUD's Housing Quality Standards (HQS) for all units.

Before any financial assistance is provided, each unit is physically inspected to assure it meets HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days of the date of the initial inspection and housing navigator verifies that all deficiencies have been corrected. Inspections must be completed by a certified HQS inspector.

Key Decision Points to Include

- What standards will be required of the units that receive rental assistance from your housing program? What documentation will be required per unit?
- What staff will complete these checks on units?
- Will the program require a unit inspection? If so, what level of inspection will be required? What staff will receive training to conduct these inspections? Is there another agency or private contractor in the community who could provide inspections for the housing program? In addition to HQS inspections, your program may want to use habitability standards that are a lower standard provided by HUD.¹

Landlord Supports

This section outlines all the supports provided to participating landlords. Supports range from providing a direct contact for issues to financial incentives. The section should outline if there are any limitations on the supports provided and who is authorized to provide supports to landlords, especially financial incentives. In addition, the section should outline any requirements for landlords to receive supports.

Suggested Language for Section:

The housing program will distribute electronic materials to landlords detailing all landlord support policies and procedures, as well as basic information about the housing program and responses to frequently asked questions.

(Name of Agency/Staff Responsible) will be the primary contact for landlords and will ensure that landlords have a streamlined process for contacting them in case of developing issues with participants' housing and respond in a timely manner (within 1 business day) to all landlord contacts. In addition, *(Name of Agency/Staff Responsible)* will proactively call participating landlords monthly to see if there are any issues threatening tenancy that need to be addressed. *(Name of Agency/Staff Responsible)* will coordinate with the case managers to assist the household in addressing any issues that arise. Open and clear communication between *(Name of Agency/Staff Responsible)* and landlords, including setting realistic standards and expectations for services provided, are essential to effective landlord support.

Housing navigators and case managers will be available to mediate disputes between landlords and participants, with participant permission, as concerns arise. Housing navigators will work collaboratively

¹ <https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>

with landlords while case managers will work with households to develop mutually agreeable plans to sustain tenancy.

(Name of Agency/Staff Responsible) can negotiate additional supports, as needed, on a case-by case basis.

Landlord Incentives

The housing program will utilize any funding sources available to assist with costs such as holding fees, signing bonuses, security deposits, and first month's rent. If such assistance is required and funding is available, it will be paid directly to the property provider to reserve the unit for the participant household. Landlord incentives will be prioritized for access to units in tight rental markets and for landlords who will work with households with a high number of systemic housing barriers.

Landlord incentives that may be utilized are:

Key Decision Points to Include

- What supports will you offer to landlords? Will your program have specific policies around response times? How will you ensure that these policies are met?
- Who will be the responsible agency and/or staff who will be the primary contact for landlords?
- What financial incentives will your program provide to encourage landlords to participate in your program and accept households with a high number of housing barriers?
- To learn more about unit recruitment, engaging landlords, and financial incentives, we recommend that counties and tribal agencies check out the Landlord Engagement Guide from Change Well.²

Financial Assistance

The Financial Assistance section provides detailed information about how rental assistance will be provided by the housing program. This section should include any limitations of the rental assistance, the approach the program will utilize in providing financial assistance, and how participants will be linked to other sources of housing assistance if needed. In addition, as a housing first program, the section should detail how standard leases will be used by the program and how service participation is not conditional for financial assistance.

Suggested Language for Section:

(Responsible Agency) will administer the ongoing rental subsidies and utility allowances for all program activities with the housing program. (Responsible Agency) will pay subsidy and utility payments directly to the property provider no later than the 5th of each month. (Responsible Agency) will pay the utility payment directly to the utility company. Payments will only be made when a signed lease has been received and included in the client file. (Responsible Agency) will track monthly expenditures that will be shared with the (County/Tribal Agency).

The housing program has short- and medium-term rental assistance that may last up to XX months. When a household receiving short- and medium-term rental assistance does not stabilize and is not able

² https://www.changewellproject.com/_files/ugd/cfb8fc_e65039a7dd434cd9a3d5291bb02fc183.pdf

to take over the rental burden, the housing program will look for opportunities to transfer the household to long-term rental assistance through other affordable housing programs in the community.

Key Decision Points to Include

- Will the county/tribal agency contract with a local provider to administer rental assistance?
- What are the reporting requirements on monthly expenses? Who does the program need to report spending to in order to manage the program properly?
- Will there be limitations to the number of months that a household can receive rental assistance?

Short-Term and Medium-Term Rental Assistance

This section provides information about how rental assistance will be provided to participating households. This section should include any limitations on assistance and allow for flexibility in how households receive financial assistance to best meet their needs.

Suggested Language for Section:

Households who are enrolled in the housing program for short- and medium-term rental assistance may receive up to XX months of rental assistance. Rather than all households being given the same package of assistance, the case manager will coordinate with the program to provide a flexible amount of financial assistance to stabilize the household in the unit based on the household's income and housing goals.

The goal of the housing program is to have the household take over the payment of rent, to assist the applicant apply for long term housing supports, or to provide shallow rental assistance that covers the difference between what they can contribute and the actual cost of rent.

In rapid rehousing programs, such as CalWORKs HSP, case managers and households will determine the monthly contribution of the household to the rental payment with (Responsible Agency) providing the rest of the rental amount. If a household does not currently have income and/or they are using available income to meet other housing goals, they are not required to contribute towards rental payments. By contributing towards rent, no matter how small, households may get more comfortable with the process of paying rent. Ideally, the household will pay increasing amounts of the rent, but the housing program recognizes that households may need to move up and down in their contributions depending on periodic changes in household income.

Some participants may not be able to assume responsibility for rent due to fixed sources of income, like SSI or retirement. Case managers may want to think about linking participants to the larger rehousing system and/or assisting the participant apply for long-term housing subsidies. If approved, participants will eventually contribute up to 30% of adjusted gross income and this will be determined by...

The Home Safe program allows for shallow subsidies and while this is a great option, case managers should think about long term sustainability of the unit given finite sources of income. If the participant will not be able to take over the full responsibility for paying rent, case managers may consider that applying for long term subsidies may be the appropriate next step.

Financial assistance will end once the household is able to pay the full rental amount on an ongoing basis. Case managers will update (Responsible Agency) when households have reached this goal. All households will receive 30 days' written notice of the end of financial assistance.

If a household receiving short- and medium-term rental assistance has not stabilized in the unit and is not able to pay the full rental amount, case managers will alert (Responsible Agency) of a need for long-term rental assistance resources. If a household needs both long-term rental assistance and continued supportive services to maintain a unit, the household will be referred to available permanent supportive housing programs in the community. If the household only needs long-term rental assistance, then the case manager will link the household to other affordable housing resources such as subsidized units or rental vouchers.

Key Decision Points to Include

- Will there be limitations to the number of months that a household can receive rental assistance?
- Will your program require a contribution towards rent? CDSS does not require a household contribution towards rent.
- How will the program determine which households will contribute towards rent?
- Will case managers use a specific tool to help determine the household contribution towards rent? If so, we recommend including this tool in the appendix.
- Is the responsible agency able to pay rental assistance and utility assistance in a timely way? Are they flexible enough to allow for changing tenant contributions to rent?
- Do case managers know about local housing resources to connect participants to permanent supportive housing and other affordable housing programs? Where can they go to find this information?

Commented [RW12]: I would put as a key question "CDSS does not require a household contribution towards rent. Will your program require a contribution and for which clients?"

Connecting to Other Housing Assistance Resources

This section should outline the available local housing resources that participating households can be referred to for long-term rental assistance. Programs can continue to provide services if rental assistance is provided by another program. By seeking other forms of rental assistance, it expands the number of households your program can serve.

Suggested Language for Section:

The housing program continually seeks other sources of funding to support ongoing housing assistance for households in the program. Other initial housing resources include:

- Housing Choice Vouchers and Emergency Housing Choice Vouchers from partner public housing authorities
- Subsidized units created through tax credits and other affordable housing incentives
- Public housing units from public housing authorities
- Local CoC housing programs

If a household transfers to another source of rental assistance, then...

Key Decision Points to Include

- Are there other sources for rental assistance in your community not listed in the suggested language that should be added?

- What happens when a household transfers to another rental assistance source? In what instances will services stop or continue?
- If a move is required to obtain another form of rental assistance, will your program assist with moving costs?
- How will your program coordinate with the new program providing rental assistance?

Standard Leasing

This section should outline the policies around each household using a standard lease to secure a unit. As a housing first program, participants need to have the tenant protections afforded by a standardized lease.

Suggested Language for Section:

All households receiving financial assistance will have standard CA leases or rental agreements. Leases may not include terms that are directed only toward individuals with disabilities or other protected groups. The housing program will not require additional house rules to receive financial assistance. All leases are renewable at tenants' and owners' option.

Leases for participants must be written, legally binding documents. Leases are not allowed to have:

- Additional requirements beyond what is covered in a lease agreement typical to the area
- Any provisions that are contradictory to program policies and procedures, such as requiring drug testing or program participation

Upon lease signing, case managers will explain and help households understand basic tenant-landlord rights and requirements of specific leases including:

- Tenant rights as defined by federal, California, and local laws and ordinances
- Tenant responsibilities regarding property damage, keeping properties they occupy clean and safe and notifying landlords of all property management needs
- Landlord responsibilities including maintaining the property in good, safe, working condition and making all repairs as necessary within a reasonable time

Case managers will assist households in creating a plan to adhere to the lease requirements.

Key Decision Points to Include

- Do case managers understand standard leases and the roles and responsibilities for tenants and landlords? Could your agency provide training if not?
- Are program leases reviewed to assure that they do not have additional provisions? If so, by whom?

Separation of Financial Assistance and Services

This section further reiterates that there are no preconditions to receive financial assistance. As a housing first program, households do not have to participate in services to receive rental assistance.

Suggested Language for Section:

There are no preconditions for participants to receive financial assistance. Financial assistance for households will be individualized and flexible to meet the needs of the household. Households do not need to meet service goals or participate in housing support services to receive financial assistance.

Program Exit

The Program Exit section provides the policies and procedures for when a household exits the housing program. The section should include when households will be exited from the program and how staff should determine households are ready to exit the program.

Suggested Language for Section:

The housing program is a recovery-based program that believes that households can stabilize and maintain their housing over time. Case managers and enrolled households will have conversations about moving on and graduating from rental assistance programs starting at intake. Case managers and participants should review progress toward housing plan goals every 90 days. In general, a household will be deemed appropriate for exit from services when they have achieved or demonstrated significant progress towards achieving their own identified housing goals.

For those households receiving short- and medium-term rental assistance, households will be exited when they are able to pay the full rental burden and no longer need housing support services, or at the end of XX months. If a case manager identifies that a household is not able to pay the full rental burden and does not have the means to increase their income to do so, the case manager will work to identify other long-term rental subsidies to support the household (i.e., Housing Choice Voucher, subsidized units, etc.). The case manager will assist the household in applying and enrolling in these rental assistance programs.

Case managers will provide a XX-day notice of financial assistance ending at program exit to the household and the housing program.

Key Decision Points to Include

- Will your housing program put a limit on the number of months that rental assistance is provided?
- Will your program use a specific tool to create a housing plan and monitor a household's progress towards their goals?
- How much advance notice will you provide a household that rental assistance is ending?

Program Termination

The Program Termination section provides information about why a household would be terminated from the housing program. These reasons could include endangering staff or misrepresenting information pertaining to eligibility (ex. financial earnings). The section needs to include the process that staff will use to notify the household of the termination and end of rental assistance.

Suggested Language for Section:

Housing program participants may voluntarily terminate their services at any time for any reason.

Involuntary exits from services should be extremely rare and a last resort if a participant is exhibiting serious violations of their responsibilities (threats to health or safety of staff or other participants,

misrepresentation of eligibility information including not providing information for income recertification, extended inability to contact the participant following repeated attempts through phone, email, home visits or other outreach). Extended inability to contact will be defined as XX contact attempts using two different outreach methods, if available, over 1 month with a final warning provided on the Xth contact.

Case managers should first make multiple attempts to work with participants on challenges and maintain service provision as planned and desired by participants. Participants may not be terminated from the program for any of the following reasons:

- Failure to participate in supportive services
- Failure to make progress on a service plan
- Loss of income or failure to improve income
- Domestic violence
- Any other activity not covered in a lease agreement typical to the service area.

Housing program terminations are effective within XX days of written notification of the client, pending appeals. Households will be given XX days to file an appeal.

Key Decision Points to Include

- What are the reasons that a household could be terminated from the program? Termination should be used as a last resort with staff focusing on engaging households in the program.
- How many attempted contacts will be made prior to terminating from the program?
- To be housing first, participants cannot be terminated for the reasons listed in the suggested language. Are there additional reasons you want to list for why a participant should NOT be terminated?
- How many days advance notice should participants receive?

Grievance Procedure

This section includes information about the grievance process participants can utilize to appeal a program termination. We recommend utilizing any existing grievance process that the county/tribal agency has in place for other submitting grievances regarding programs and/or services.

Suggested Language for Section:

The (County/Tribal Agency Name) will provide the following grievance procedure for households being terminated from the program. Initially, a participant can bring a grievance to the program manager and/or case manager supervisor who may suggest a resolution to the participant. Participants can file their grievance by calling XXX-XXX-XXXX and filing a verbal complaint.

If a participant is still dissatisfied, the grievance can be moved to a higher level for an appeals board to review. The appeals board will meet within XX days to review the grievance at a time, date, and place that is convenient for the participant to attend. The appeals board will make the final decision about program termination. The appeals board will be made up of representatives from...

Key Decision Points to Include

- Do you have an existing grievance process to use for the housing program?

Commented [RW13]: I've also seen simpler grievance policies where the first step is that a supervisor or program manager is assigned to the grievance and suggest a resolution to the participant. If the participant is still dissatisfied, grievance can be moved to a higher level (or a group designated).

- How will participants be able to file a grievance with the program? We recommend having a verbal process to illuminate any barriers due to lack of literacy.
- Who will review the filed grievance? Within what timeframe does the program need to review the grievance?

Requisition Process

If the county/tribal agency is contracting with a local provider to implement the housing program or key components of the program, this section provides an overview of the process for the local provider to receive funds to implement the program. This section should include information about how often the local provider can request funds, what documentation is required, what system will be used to track the request, and how soon the provider can expect to receive payment.

Key Decision Points

- Will the county/tribal agency provide any advance funding to the local provider to get the program started? An advance is helpful for a nonprofit provider to cover the upfront costs of starting a program.
- If providing an advance, what are the policies about how this funding will be tracked against expenses incurred?
- What happens if a local provider's requisition request is not approved?
- The county or tribal agency should consider that a nonprofit local provider needs repayment at regular intervals, especially as the rental load of the program increases. We encourage the county/tribal agency to allow for at least monthly requisitions and payments to be made within a week of approved requisitions.

Data Collection Requirements

The Data Collection Requirements section should outline what and where data will be collected for participant households in the program. The section should also include policies about access and privacy of program participant information. We recommend using Change Well's Client File Checklist to determine what documentation will be required for the program, at what intervals the documentation should be collected, and where it should be stored. Subsections should be included in this section for all types of storage used by the program.

HMIS and Comparable Database

CDSIS requires that housing programs enter program data into their local HMIS system. A county or tribal agency should work with the local HMIS administrator to determine what policies the program needs to ensure that the HMIS system receives accurate and complete data collection. Many HMIS systems have policies about what data is collected, timeliness for putting data into the HMIS system, and standards for data completeness. You may want to include references to any paper forms that staff can use to collect HMIS data and include them in the appendix.

Key Decision Points

- Does your HMIS administrator already have a process for overseeing data quality? Will your program have any additional ways to monitor program data quality and completeness?

Commented [RW14]: @Elena Fiallo do we want to put in a reference to the requirement for programs to ensure participant info is entered in HMIS?

- Do your staff have access to WIFI hotspots, so they do not access HMIS through a public WIFI network?

Client Files

If the program will keep paper documentation for households, this subsection should include the list of documents that should be stored in the client file. The section should also include rules around storage of these files and how long the program should retain paper files for households. The county or tribal agency may already have policies about client file storage. If so, that policy should be used here. If files will be saved electronically, this subsection should include policies for where electronic client files will be saved.

Key Decision Points

- Have you designated a place for paper file storage? Often, policies require that the room or filing cabinets can be locked to limit access to them. Is this possible?
- How will files be destroyed once it is determined that they no longer need to be stored?
- If working with a local contracted provider, we recommend you have a policy that ensures the contractor retains files and outlines who owns the files and how they are returned in the event of the contract ending.

Commented [RW15]: Should we add that if they have a contractor serving participants, they should have a policy on ensuring contractor retains files and who owns the files (and how they are returned) in the event of end of the contract (or early termination of the contract)

Contract Monitoring

If a county/ tribal agency is contracting with a local provider to implement the housing program or key components of the program, the Contract Monitoring section should describe the monitoring procedures for contract management. The section should describe how the monitoring will be done (in person or electronically), what will be reviewed, what the county/tribal agency will want access to, and how often monitoring will take place. Monitoring should include financial monitoring to ensure that funds are being spent on eligible expenses with the correct documentation and program quality assurance to ensure that the program is operating according to policies and procedures.

Suggested Language for Section:

(County/Tribal Agency Name) will monitor the local contracted provider's program performance at least once during the contract year. Monitoring will ensure that the program requirements established within these policy and procedures and the contract are met. Monitoring is also an opportunity to learn from the contractor about issues they are facing such as: (1) needing additional resources, (2) barriers to services created by program policies or procedures, and (3) new needs presenting among participants. The local contracted provider is expected to make available all financial and program records.

Key Decision Points

- With a new contract provider, it may be helpful to do several monitoring visits throughout the first year to ensure the provider is maintaining good records and operating the program according to policies.
- Will the county or tribal agency allow the local contract provider to correct issues that arise from monitoring?
- Do you have a standardized tool to monitor financial and program performance? If so, we recommend including in the appendix.

Commented [RW16]: I would also add something like "Program Monitoring is also an opportunity to learn from the contractor about issues they are facing such as: (1) needing additional resources, (2) barriers to services created by program policies or procedures, and (3) new needs presenting among participants. (I'm trying to get at this is an opportunity for the funder/county to learn from the contractor and make changes

- What are the consequences of a local provider not meeting monitoring standards?
- Will you include program participants in evaluating the local contractor's performance through surveys or interviews?
- Monitoring is also an opportunity for the local provider to share information with (County/Tribal Agency Name). Will you incorporate a process to seek feedback from the local agency?

Commented [RW17]: I added something here. Feel free to change

Affirmatively Furthering Fair Housing

The Affirmatively Furthering Fair Housing section affirms that the county/tribal agency's housing programs will operate within all Fair Housing laws at the Federal and State level. If there is an existing fair housing policy that is used by the county/tribal agency, be sure to use that language here. If there is not an existing policy, then you can use the suggested language below.

Suggested Language for Section:

Fair housing means all persons have equal opportunity to be considered for rental units, purchase of property, housing loans, and property insurance.

California fair housing laws makes it illegal to discriminate in housing because of race, color, religion, sex, national origin, disability, family status (families with children), source of income, sexual orientation, marital status, age, arbitrary characteristics, gender identity and gender expression, citizenship and immigration status, primary language, genetic information, and military or veteran status.³

Anyone who has control over residential property and real estate financing must obey the law. This includes landlords, real estate agents, home sellers, builders, mortgage lenders, and others engaging in the housing business.

(County/Tribal Agency Name) complies with all applicable state and federal fair housing laws.

Key Decision Points

- How will program staff be trained in the Fair Housing Law and what to do if they believe a program participant is being discriminated against?
- Are there local resources or trainings that should be referenced for program staff to read further?

Anti-Discrimination Policy and Equal Access

The Anti-Discrimination Policy and Equal Access section should include the county/tribal agency's existing anti-discrimination and equal access policy. If your county or tribal agency does not have an existing policy, then you can use the suggested language below.

Suggested Language for Section:

³ <https://calcivilrights.ca.gov/housing/#whoBody>

(County/Tribal Agency Name) and its affiliates do not discriminate in housing services or employment on the basis of race, color, national origin, religion, age, disability, or sex.

(County/Tribal Agency Name) complies with all applicable fair housing and civil rights requirements.

(County/Tribal Agency Name) is a housing first program and (County/Tribal Agency Name) contracted agencies use a Housing First approach. This means that (County/Tribal Agency Name) believes all clients are ready for housing and puts no conditions on the receipt of housing assistance. If clients have barriers to obtaining housing (such as bad credit), (County/Tribal Agency Name) uses its extensive landlord network to find a landlord that will rent to the client even with their barriers. If clients have barriers to maintaining housing (such as substance use disorders), (County/Tribal Agency Name) links clients to intensive services to help address those barriers while they are in housing.

Key Decision Points
<ul style="list-style-type: none">• How will program staff be trained in the Anti-Discrimination Policy and Equal Access policy?• Are there local resources that should be referenced for program staff to read further?

Appendix I: Referral, Eligibility Verification, and Prioritization Tool

Appendix II: Eligible Expenses

Appendix III: Client File Checklist

Appendix IV: Participant Housing Plan

Appendix V: Determining Household Rental Contribution

Appendix VI: Client File Checklist

Appendix VII: Contract Monitoring Tool

Commented [EC18]: Could create template for these decisions

Commented [RW19R18]: I think it would be great to create an eligible expenses template that lists all possible eligible expenses by category, and the program will need to enter "Yes" whether is allowable for a program, up to what \$ allowable, and what is process for approval.

Commented [EC20R18]: Yes- and documentation needed for each. This could look similar to the client file checklist