

CHAPTER 19

TARGETED RENTAL ASSISTANCE

INTRODUCTION

The CDA administers a number of rental assistance programs which are targeted to specific populations. The federally-funded programs of Family Unification Program and Veteran Affairs Supportive Housing are covered in this section. For these targeted programs, all other policies described in this Administrative Plan are applicable, except as described in this Chapter.

This chapter consists of the following six parts.

- Part I: Family Unification Program
- Part II: Veterans Affairs Supportive Housing
- Part III: Family Self Sufficiency/Earning Power
- Part IV: Continuum of Care/Shelter Plus Care
- Part V: Bridges I and Bridges II

PART I: FAMILY UNIFICATION PROGRAM

19-I.A. OVERVIEW

The Washington County CDA administers Housing Choice Vouchers (HCV) through the Family Unification Program (FUP) of the U.S. Department of Housing and Urban Development (HUD). The Washington County FUP is a collaborative effort between the Washington County CDA and Washington County Community Services Division. The goals of the FUP in Washington County are:

- To ensure that rental assistance help clients who are involved with the child welfare system to find affordable and decent housing in a safe and supportive environment.
- To ensure that children who remain with, or are reunited with, their families are safe and secure and not subject to neglect as a result of homelessness or inadequate housing.
- To ensure that youth 18 through 24 years of age who left foster care at age 16 or older have affordable and adequate housing.

All applicants for the FUP must be referred by Washington County Community Services, meet the eligibility criteria at the time of referral, selection and voucher issuance.

The policies in this Administrative Plan are applicable to the FUP vouchers except as noted in this Addendum. The policies set forth in this section of the Administrative Plan will ensure the rapid utilization of FUP vouchers.

19-I.B. ELIGIBILITY

Washington County Community Services will determine a family's eligibility for FUP. The CDA will determine a family's eligibility for the HCV program. A FUP eligible family is one that:

- Is eligible for the HCV program; and
- The lack of adequate housing is a primary factor in the imminent placement of a family's child in out-of-home care, or in the delay of reuniting a child who is in out-of-home care with the family; or in cases where the family's child is currently placed in out-of-home care, the child will be returned within 60 days; or
- A youth who is between the ages of 18 and 24 years of age and who left the foster care system at the age of 16 or later and who does not have adequate housing.

For the purposes of the FUP program, Lack of Adequate Housing is defined as meeting one or more of the following:

- A family is living in substandard or dilapidated housing;
- A family is homeless;
- A family is displaced by domestic violence;
- A family is living in an overcrowded unit; or
- A family is living in housing not accessible to its disabled child or children due to the nature of the disability.

Substandard Housing is defined as a housing unit which meets one or more of the following:

- Is dilapidated: the unit does not provide safe and adequate shelter, and in its present condition endangers the health, safety or well-being of a family or the unit has one or more critical defects, or a combination of intermediate defects in sufficient number or extent to require considerable repair or rebuilding. The defects may involve original construction, or they may result from continued neglect or lack of repair, or from serious damage to the structure.
- Does not have operable indoor plumbing;
- Does not have a usable flush toilet inside the unit for the exclusive use of the family;
- Does not have a usable shower or bathtub inside the unit for the exclusive use of the family;
- Does not have electricity or has inadequate or unsafe electrical service;
- Does not have a safe or adequate source of heat;
- Does not, but should, have a kitchen; or
- Has been declared unfit for habitation by an agency or unit of government.

Homeless Family is defined as a family that lacks a fixed, regular, and adequate night-time residence or has a primary night-time residence that is:

- A supervised, publicly or privately operated shelter designed to provide temporary living accommodations (including congregate shelters and transitional housing);
- An institution that provides a temporary residence for persons intended to be institutionalized; or
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Involuntarily Displaced Due to Domestic Violence is defined as a person or family who has vacated a housing unit because of domestic violence or lives in a housing unit with a person who engages in domestic violence. “Domestic violence” means actual or threatened physical violence directed against one or more members of the family by a spouse or other member of the household. For an applicant to qualify under this category, the actual or threatened violence must have occurred recently, or be of a continuing nature, and the applicant must certify that the person who engaged in such violence will not reside with the applicant family.

Living in an Overcrowded Unit is defined as a family who:

- Is separated from its child or children and the parent(s) are living in an otherwise standard housing unit, but after the family is reunited, the unit would exceed the CDA’s Occupancy Standards; or
- Is living with its child or children in a unit that is overcrowded for the entire family in accordance with the CDA’s Occupancy Standards; and this overcrowded condition may result in the imminent placement of its child or children in out-of-home care.

Support Services

The Washington County Community Services Division will provide case management services to FUP participants for a period of not less than 12 months for families and not less than 36 months for youth. FUP participants shall participate in the development and implementation of the service plan but failure to participate will not jeopardize the rental subsidy.

FUP participants may be offered the opportunity to participate in the CDA’s Family Self-Sufficiency (FSS) so as to expand their access to services in their communities.

19-I.C. OUTREACH AND REFERRALS

Washington County Community Services will refer applicants to the CDA. Washington County Community Services will ensure that the applicants being referred are FUP-eligible and then forward the Referral Form/Certification of Eligibility form to the CDA.

If a HCV applicant appears to be FUP-eligible, the CDA will refer the applicant to Washington County Community Services. Washington County Community Services staff will make the referral if they are able to confirm FUP-eligibility.

19-I.D. APPLICATIONS, WAITING LIST AND TENANT SELECTIONS

Waiting List

Upon referral from Washington County Community Services, the CDA will add FUP-eligible families and youth to the waiting list. Washington County Community Services will only make eligible referrals when the CDA has notified Community Services that there is an eligible voucher available.

All FUP vouchers will be issued to other FUP-eligible applicants upon turnover.

Tenant Selections

FUP applicants will be selected in order by date of referral. When a FUP voucher is available, the first eligible applicant will be issued a voucher. The CDA and Washington County Community Services will work closely regarding the placement and selection of all applicants.

If the applicant is FUP-eligible, a detailed HCV application must be completed. The application will be submitted by Washington County Community Services to the CDA with the Referral Form/Certification of Eligibility. The CDA will perform a standard eligibility check including, but not limited to, income verification, household composition, eligible immigration status and criminal background screening. The CDA recognizes that FUP eligible families and youth may have illegal drug or criminal activity in their backgrounds; as long as FUP eligible families or youth are able to demonstrate that they are in recovery and are in compliance with any court orders they will be admitted to the FUP program. Verification of any other preference/eligibility will be required in accordance with Chapter 3 of this Plan.

19-I.E. BRIEFINGS AND VOUCHER ISSUANCE

When verification of eligibility is complete the CDA will issue a FUP voucher and conduct an applicant briefing that will cover topics such as apartment search and leasing process, negotiating a lease, apartment maintenance, housekeeping, budgeting, housing discrimination, housing quality standards, program requirements and tenants' rights and responsibilities. Washington County Community Services Division staff is encouraged to attend all HCV-related functions with their clients and help them locate suitable and safe housing. The CDA will remain in close contact with the Washington County Community Services Division regarding the status of each FUP applicant throughout this process.

19-I.F. TERMINATION OF ASSISTANCE AND TENANCY

By law, a FUP voucher issued under this program may only be used to provide housing assistance for youth for a maximum of 36 months. The CDA requires families to enter into 12-month leases. If a youth exercises portability, the initial PHA will be responsible for terminating assistance at the end of 36 months.

FUP regulations state that if a family, that leases a unit under FUP, loses parental rights or the children are removed from the unit again, that family maintains the FUP voucher.

19-I.G. PROGRAM INTEGRITY

The CDA is responsible for defending its eligibility and participation decisions pertaining to the family's FUP voucher rental assistance. Informal review procedures for applicants are set forth in Section 16.2 of this Plan. Informal hearing procedures for participants are set forth in Chapter 16 Section 3 of this Plan.

The Washington County Community Services Division is responsible for defending its FUP eligibility determination and a similar informal review procedure will be utilized.

19-I.H. AFFIRMATIVELY FURTHERING FAIR HOUSING

In addition to maintaining compliance with the fair housing requirements of 24 CFR Section 903.7(o), the Washington County CDA will take reasonable steps to affirmatively further fair housing in regards to any vouchers that may be awarded under the Family Unification Program (FUP). If funding is awarded to the CDA under the Family Unification Program, the CDA will take the following steps:

1. The CDA will work with Washington County Community Services to identify and certify eligibility for all FUP eligible families and youth that may be on the CDA's waiting list and ensure that the family or youth maintain their original position on the waiting list after certification.
2. The CDA will appropriately place all FUP eligible family and youth referred by Washington County Community Services on the Housing Choice Voucher Program waiting list in order of first come, first served.
3. The CDA will inform applicants on how to file a fair housing complaint including the provision of the toll free number for Housing Discrimination Hotline: 1-800-669-9777.

PART II: VETERANS AFFAIRS SUPPORTIVE HOUSING

19-II.A. OVERVIEW

The Washington County CDA administers Housing Choice Vouchers (HCV) through the Veteran's Affairs Supportive Housing (VASH) program. These vouchers have been made available from the U.S. Department of Housing and Urban Development (HUD) in collaboration with Veterans' Administration. The Washington County VASH is a collaborative effort between the Washington County CDA and Minneapolis Veterans' Affairs Community Resource and Referral Center (CRRC). The goals of VASH in Washington County are:

- To ensure that rental assistance be available to homeless veterans who are working with Case managers from the Veterans Hospital located in Minneapolis.

All applicants for VASH must be referred by Minneapolis Veteran's Affairs Office and meet the eligibility criteria at the time of referral, selection and voucher issuance.

The policies in this Administrative Plan are applicable to the VASH vouchers except as noted in this Addendum. The policies set forth in this section of the Administrative Plan will ensure the rapid utilization of VASH vouchers.

19-II.B. ELIGIBILITY

The Minneapolis Veterans Affairs Community Resource and Referral Center (CRRC) will determine the veteran's eligibility for VASH. The CDA will determine a family's eligibility for the rental assistance program. A VASH eligible family is one that:

- Is eligible for the HCV program; and
- lacks of adequate housing; and
- is disabled.

For the purposes of the VASH program, Lack of Adequate Housing is defined as meeting one or more of the following:

- A family is living in substandard or dilapidated housing;
- A family is homeless;
- A family is displaced by domestic violence;
- A family is living in an overcrowded unit; or
- A family is living in housing not accessible to its disabled child or children due to the nature of the disability.

Substandard Housing is defined as a housing unit which meets one or more of the following:

- Is dilapidated: the unit does not provide safe and adequate shelter, and in its present condition endangers the health, safety or well-being of a family or the unit has one or more critical defects, or a combination of intermediate defects in sufficient number or extent to require considerable repair or rebuilding. The defects may involve original construction, or they may result from continued neglect or lack of repair, or from serious damage to the structure.
- Does not have operable indoor plumbing;
- Does not have a usable flush toilet inside the unit for the exclusive use of the family;
- Does not have a usable shower or bathtub inside the unit for the exclusive use of the family;
- Does not have electricity or has inadequate or unsafe electrical service;
- Does not have a safe or adequate source of heat;
- Does not, but should, have a kitchen; or
- Has been declared unfit for habitation by an agency or unit of government.

Homeless Family is defined as a family that lacks a fixed, regular, and adequate night-time residence or has a primary night-time residence that is:

- A supervised, publicly or privately operated shelter designed to provide temporary living accommodations (including congregate shelters and transitional housing);
- An institution that provides a temporary residence for persons intended to be institutionalized; or

- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Involuntarily Displaced Due to Domestic Violence is defined as a person or family who has vacated a housing unit because of domestic violence or lives in a housing unit with a person who engages in domestic violence. “Domestic violence” means actual or threatened physical violence directed against one or more members of the family by a spouse or other member of the household. For an applicant to qualify under this category, the actual or threatened violence must have occurred recently, or be of a continuing nature, and the applicant must certify that the person who engaged in such violence will not reside with the applicant family.

Living in an Overcrowded Unit is defined as a family who:

- Is separated from its child or children and the parent(s) are living in an otherwise standard housing unit, but after the family is reunited, the unit would exceed the CDA’s Occupancy Standards; or
- Is living with its child or children in a unit that is overcrowded for the entire family in accordance with the CDA’s Occupancy Standards; and this overcrowded condition may result in the imminent placement of its child or children in out-of-home care.

Support Services

The CRRC provides case management services to VASH participants. VASH participants must remain in good standing with their case managers. Failure to participate in the case management plan may result in termination of the rental assistance.

19-II.C. OUTREACH AND REFERRALS

The VA CRRC will refer applicants to the CDA. THE VA CRRC will ensure that the applicants being referred are VASH-eligible and then forward the Referral Form/Certification of Eligibility forms to the CDA.

19-II.D. APPLICATIONS, WAITING LIST AND TENANT SELECTIONS

Waiting List

Upon referral from VA CRRC, the CDA will add VASH-eligible households to the waiting list. THE VA CRRC will only make eligible referrals when the CDA has notified the VA CRRC that there is an eligible voucher available.

All VASH vouchers will be issued to other VASH-eligible applicants upon turnover.

Tenant Selections

VASH applicants will be selected in order by date of referral. When a VASH voucher is available, the first eligible application will be issued a voucher. The CDA and VA CRRC will work closely regarding the placement and selection of all applicants.

If the applicant is VASH-eligible, a detailed HCV application must be completed. The CDA will perform a standard eligibility check including, but not limited to, income verification, household composition, eligible immigration status and criminal background screening. The CDA recognizes that VASH eligible households may have illegal drug or criminal activity in their backgrounds; as long as VASH eligible households are able to demonstrate that they are in recovery and are in compliance with any court orders they will be admitted to the VASH

program. Verification of any other preference/eligibility will be required in accordance with Chapter 3 of this Plan.

19-II.E. BRIEFINGS AND VOUCHER ISSUANCE

When verification of eligibility is complete the CDA will issue a VASH voucher and conduct an applicant briefing that will cover topics such as apartment search and leasing process, negotiating a lease, apartment maintenance, housekeeping, budgeting, housing discrimination, housing quality standards, program requirements and tenants' rights and responsibilities. The VA CRRC staff is encouraged to attend all HCV-related functions with their clients and help them locate suitable and safe housing. The CDA will remain in close contact with the VA CRRC regarding the status of each FUP applicant throughout this process.

19-II.F. TERMINATION OF ASSISTANCE AND TENANCY

The CDA requires families to enter into 12-month leases. VASH families are allowed to port immediately. After the initial 12 month lease a household may move with a 60 day notice to the CDA. If the VASH household violates any of the other requirements under other sections of this plan, their assistance may be terminated. If the VASH household does not cooperate with their CRRC case manager, their assistance may be terminated.

19-II.G. PROGRAM INTEGRITY

The CDA is responsible for defending its eligibility and participation decisions pertaining to the family's VASH voucher rental assistance. Informal review procedures for applicants are set forth in Section 16.2 of this Plan. Informal hearing procedures for participants are set forth in Chapter 16 Section 3 of this Plan.

The VA CRRC is responsible for defending its VASH eligibility determination and a similar informal review procedure will be utilized.

19-II.H. AFFIRMATIVELY FURTHERING FAIR HOUSING

In addition to maintaining compliance with the fair housing requirements of 24 CFR Section 903.7(o), the Washington County CDA will take reasonable steps to affirmatively further fair housing in regards to any vouchers that may be awarded under the VASH program. If funding is awarded to the CDA under the VASH Program, the CDA will take the following steps:

4. The CDA will work with VA CRRC to identify and certify eligibility for all VASH eligible households that may be on the CDA's waiting list and ensure that the VASH applicants maintain their original position on the waiting list after certification.
5. The CDA will appropriately place all VASH Households referred by VA CRRC on the Housing Choice Voucher Program waiting list in order of first come, first served.
6. The CDA will inform applicants on how to file a fair housing complaint including the provision of the toll free number for Housing Discrimination Hotline: 1-800-669-9777.

PART III: FAMILY SELF-SUFFICIENCY PROGRAM/EARNING POWER

19-III.A. OVERVIEW

The Family Self-Sufficiency Program (FSS) was established by the CDA to promote economic self-sufficiency among participating families. At the Washington County CDA the program has been renamed Earning Power. This program is aimed at coordinating and providing private and public sector support services necessary to enable families to achieve self-sufficiency goals. The CDA offers this program to participants of the Housing Choice Voucher Program and the Family Unification Program as an opportunity to build an escrow savings account which may be used by the family for a variety of things including down payment for a home, reliable transportation, repayment of student loans, etc.

The CDA administers the Family Self Sufficiency (FSS) program in accordance with 24 CFR 984.101 through 984.401.

PART IV: CONTINUUM OF CARE PROGRAM/SHELTER PLUS CARE

19-IV.A. OVERVIEW

The Suburban Metro Area Continuum of Care (SMAC), through federal grant monies, supplies funding for the Shelter Plus Care program. The Shelter Plus Care program provides permanent housing and supportive services to homeless households with disabilities. The CDA administers this program in the form of sponsor based rental assistance. Canvas Health and St. Andrew's Community Services Center provide the necessary supportive services. Activities funded through the Shelter Plus Care grant include rent subsidies and reimbursement of some administrative expenses while the supportive services are funded by Canvas Health through a separate grant from the Continuum of Care. The CDA assists 22 households at minimum through this grant. An additional 4 households have been established with the funds from program savings as participants are paying a portion of their rent. The CDA administers the Shelter Plus Care program in accordance with 24 CFR 582 and 24 CFR 578.

The policies outlined in this Plan will be used when not addressed in the CoC/ HUD Community Planning and Development (CPD) regulations.

19-IV.B. ELIGIBILITY

The Shelter Plus Care program is designed to assist a targeted population: persons who are homeless with disabilities, including serious mental illness, and/or have chronic problems with alcohol, drugs, or both. Canvas Health owns or master leases the units to be used for housing. Prescribed services through that are available for Shelter Plus Care participants include: Assistance in obtaining appropriate health care, mental health treatment, alcohol and other substance abuse services, child care services, case management services, counseling, supervision, education, job training and other services essential for achieving and maintaining independent living.

It is expected that a number of clients referred to the CoC program may have a criminal history of drug related and/or violent behavior; therefore, the CDA has adopted a Housing First approach for administration of this program. A criminal background check will not be performed for adult members, 18 years of age and older.

19-IV.C. OUTREACH AND REFERRALS

The CDA operates the Shelter Plus Care program throughout Washington County, Minnesota.

The Shelter Plus Care program was designed to assist a targeted population and is authorized by Title IV; Subtitle F of the Steward B. McKinney Homeless Assistance Act (the McKinney Act) [42 U.S.C. 1403-11407b). Rental assistance is linked to supportive services for homeless persons with disabilities. Canvas Health notifies the Coordinated Entry program when there is an opening in one of the units. Through a VI-SPDAT assessment performed by either Washington County Community Services or St. Andrew's, a determination of the most vulnerable participant who matches the described program targeting is notified of the opening.

19-IV.D. APPLICATIONS, WAITING LIST AND TENANT SELECTION

Coordinated Entry maintains the list of the applicants qualifying for services. When Canvas Health has an opening in the unit Coordinated Entry is notified. Wait list preferences described in this Plan are not applicable to the Shelter Plus Care program.

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19-IV.E. INCOME AND SUBSIDY DETERMINATIONS

Income will be determined and verified in accordance with Chapters 6 and 7 of this Plan.

Under the Shelter Plus Care program, the Family Share will never exceed the TTP as calculated in Section III of Chapter 6. The family share will be 30% of the family's adjusted monthly income or 10% of the family's gross monthly income.

19-IV.F. HOUSING QUALITY STANDARDS AND RENT REASONABLENESS DETERMINATIONS

All assisted units must meet HQS at the initial lease term and annually thereafter. Inspections will be made in accordance with Chapter 8. All units assisted under the Shelter Plus Care program must be determined reasonable, in accordance with Chapter 8. The inspections and rent reasonableness determinations will be the responsibility of the CDA. The CDA may not perform inspections on units that are owned by the CDA.

19-IV.G. MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY

Households in the units that are Master Leased are allowed to move to new units if the unit fails to pass HQS and the landlord refuses to repair the unit, or the landlord chooses to withdraw from the program. The new unit must be Master Leased by Canvas Health. Tenants who are housed in units owned by Canvas Health are not allowed to move their assistance to another unit. Shelter Plus Care is not portable due to the need for the supportive services.

19-IV.H. SPECIAL HOUSING TYPES

Homeownership is not an option under the Shelter Plus Care program.

19-IV.I. PROGRAM ADMINISTRATION

An informal review for applicants does not apply to the Shelter Plus Care program, as they do not enter the program from the CDA's waiting list. Shelter Plus Care participants are taken from the Coordinated Entry list. If the tenant is accepted into the Canvas Health unit, they are then referred to the CDA to receive rental assistance. After receiving rental assistance, the Shelter Plus Care participant has the right to an informal hearing as set forth in Chapter 16, Section III of this Plan.

An Annual Progress Report is submitted to HUD at the end of each operating year of the grant. The Shelter Plus Care performance is not reported through SEMAP.

19-IV.J TERMINATION OF ASSISTANCE AND TENANCY

MUTUAL RESCISSION:

If the participant and the Sponsor agree to a mutual rescission of the lease, a letter from the Sponsor will be sent to the participant. The letter will state that by signing the mutual rescission the participant is waiving their right to an informal hearing. The letter will also contain the agreed upon move out date. The letter also notifies the participant of their right to an informal hearing if the participant does not agree to the mutual rescission.

NOTICE TO VACATE:

If the Sponsor determines that the participant has violated program obligations or conditions of occupancy, the Sponsor must send a letter to the participant stating the reasons for the notice to vacate. The notice to vacate must also notify the participant of the right to an informal hearing. If the participant signs the notice to vacate, the participant is agreeing to vacate and waiving their right to an informal hearing. The letter will also contain the vacate by date. The letter must notify the participant of their right to an informal hearing if they wish to contest a vacate notice or termination.

TERMINATION OF ASSISTANCE/INFORMAL HEARING/UNLAWFUL DETAINER:

A participant may be terminated from the program for violations of the program or conditions of occupancy.

If the participant refuses the mutual rescission and the Sponsor maintains that the participant must vacate, then the participant may request in writing an informal hearing. The Sponsor must notify the participant of their right to an informal hearing to contest a termination, mutual rescission or a notice to vacate. The Sponsor must notify the CDA that the participant is exercising their right to an informal hearing. The CDA will carry out the informal hearing as described in the HCV Administrative Plan. The Sponsor will be present at the informal hearing and provide material evidence as to violations of the program or conditions of occupancy. If the informal hearing officer upholds the participant's termination from the program, the participant will be required to vacate. If the participant refuses to vacate, the Sponsor will file an unlawful detainer to re-gain possession of the unit.

LOSS OF PROGRAM FUNDING:

If the Shelter Plus Care rental assistance grant amount is reduced to a point that the number of units under Master Lease cannot be maintained, then this policy will be used to reduce the number of units. Units will be reduced in the order that they were placed under Master Lease. The most recent units would be terminated first. Affected families would be given a 60 day notice and may choose to maintain their housing by continuing the lease but with full responsibility for the entire rent. If the number of units must be reduced after all master leases have been terminated, then the Sponsor- owned unit with the most recent lease will be the first unit to be terminated until the budget is balanced.

19-IV.K CURRENT POLICIES FOR CONTINUUM OF CARE/SHELTER PLUS CARE

Shelter Plus Care Administrative Plan

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 consolidates three separate homeless assistance programs into a single grant program. The HEARTH act also codifies in law the Continuum of Care planning process, a longstanding part of HUD's application process to assist homeless persons by providing coordination in responding to their needs.

The Washington County Community Development Agency (CDA) has received grant funding for the Rental Assistance program (Shelter Plus Care program) from HUD through the local Continuum of Care (CoC). The CDA's Shelter Plus Care Rental Assistance program is a homeless assistance program that provides rental assistance to families that are homeless under the federal definition and have chronic substance abuse problems or serious mental health issues.

Canvas Health and other local service providers provide care and support to eligible families and individuals, while the CDA provides rental assistance to stabilize eligible families in the community.

The Washington County CDA's Shelter Plus Care Rental Assistance program is a sponsor based rental assistance program. Canvas Health acts as the Sponsor and holds a master lease to the units and, in turn, leases the units to eligible program participants. Canvas Health holds a master lease to or has ownership in 25 units.

INTAKE/ELIGIBILITY:

The Sponsor agrees that all contract units will be rented only to eligible households under the rules and regulations of the HEARTH act. The Sponsor will utilize Housing First principals in filling vacancies and will notify Coordinated Entry of any openings. All referrals will come through Coordinated Entry. The individual or family must qualify as homeless under paragraph (1)(i) or (ii) of the homeless definition in the continuum of care interim regulations, SHP 24 CFR 582, or Shelter Plus Care regulations 24 CFR 583. The Sponsor is responsible for determining eligibility for participation in accordance with HEARTH act rules and regulations. All eligible households will contain one or more homeless individuals with at least one of the following disabilities: Chronic substance abuse or serious mental illness.

The sponsor must obtain written verification of each household's status of homelessness:

- 1) Written third party verification is the first and preferred method. This would include statements on letterhead from shelters, street outreach workers or other credible sources (police, school officials, social workers) verifying the circumstances of a household's homelessness based on the writer's observation; or documentation on the CoC's coordinated assessment; HMIS data print out; or, discharge documents from an institution that includes exit and entrance dates.
- 2) The second preferred method of documentation of homelessness is the Sponsors intake workers' observations and conclusions.
- 3) The final method (and Least Desirable) is a self-certification of homelessness. The household would need to supply a detailed account of their homeless situation.

Participant Eligibility Documentation MUST also cite evidence that the household lacks the resources to obtain housing. This can be done by an assessment of an applicant household's financial resources or a written certification from the participant household that they lack financial and housing resources compared to housing costs in the community.

The Sponsor will provide copies of verification of homelessness, verification of disability and evidence of lack of financial resources to the CDA. Verification of homelessness must contain a description of the homelessness, i.e. person was sleeping in their car; person was sleeping outside, etc. The verification of homelessness must be on letterhead from the verifying agency. Beyond the necessary releases and documentation, the CDA will supply at the intake interview copies of the Shelter Plus Care Family Obligations, Grounds for Denial or Termination of Assistance, and the Termination Process.

Signature of the lease will be considered as the date of enrollment in the Shelter Plus Care program.

DISABILITY:

Persons with disabilities are defined as:

- A) A household composed of one or more persons at least one of whom is an adult with disability
- B) A person shall be considered to have a disability if such a person has a physical, mental, or emotional impairment which is expected to be of long-continued and indefinite duration; substantially impedes his or her ability to live independently; and is of such nature that such ability could be improved by more suitable housing conditions.
- C) (1) A severe, chronic disability of an individual that—
 - (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments;
 - (ii) Is manifested before the individual attains age 22;
 - (iii) Is likely to continue indefinitely;
 - (iv) Results in substantial functional limitations in three or more of the following areas of major life activity:
 - (A) Self-care;
 - (B) Receptive and expressive language;
 - (C) Learning;
 - (D) Mobility;
 - (E) Self-direction;
 - (F) Capacity for independent living;
 - (G) Economic self-sufficiency; and
 - (v) Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.
- (2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs

(1)(i) through (v) of the definition of “developmental disability” in this section if the individual, without services and supports, has a high probability of meeting those criteria later in life.

A participant may have a single diagnosed disability due to mental illness, developmental disability, chemical addiction, physical disability, or HIV/AIDS provided the individual meets the conditions described above.

Evidence of Disability include:

- (1) Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long continuing or of indefinite duration and substantially impedes the individual’s ability to live independently; The assessment should include a statement of the participant’s needs.
- (2) Written verification from the Social Security Administration;
- (3) The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation);

(4) Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence in paragraph (a)(4)(i)(B)(1), (2), (3), or (5) of this section; Canvas Health intake workers can make an initial observation as a determination that the participant is disabled.

(5) Other documentation approved by HUD.

Sponsor will provide documentation of disabilities.

RECORD RETENTION:

Grant Applications, Grant Award Letters, Annual Performance Report (APR) must be kept for at least five years after the end of the grant term.

Records regarding participants' eligibility and the grantee's conclusions regarding the participants' eligibility must be kept for five years after the end of the grant term. Determinations of the participants' disability must be kept for five years after the end of the grant term.

LEASE:

The lease is between the participant and Canvas Health. Canvas Health holds either a master lease on the unit between the owner and Canvas Health and subleases the unit to the participant OR has ownership interest in the unit. The initial term of the lease between participant and Canvas Health is for at least one year and is renewable for a minimum term of one month. The lease can be terminated for cause. A copy of the lease must be submitted to the Washington County CDA. Signature and date of the lease will be considered the enrollment date into the Shelter Plus Care program.

The rent must be certified as reasonable in accordance with practices in the Housing Choice Voucher Administrative Plan. The rent for the unit cannot be more than unassisted units.

HOUSING QUALITY STANDARDS INSPECTIONS:

All units must be inspected initially and annually thereafter.

If the grant recipient is the owner of the housing unit, then a different entity must conduct the HQS inspection. Inspections on all units will occur on an annual basis. The CDA will follow the policies regarding inspections in the Housing Choice Voucher Administrative plan.

RENT PORTION:

The participant's rent portion must be equal to the highest of:

- 1) 30% of monthly adjusted income, rounded to the nearest dollar as instructed by HUD.
- 2) 10% of the monthly gross income, rounded to the nearest dollar as instructed by HUD.
- 3) Portion of welfare assistance, if any, that is designated for the payment of rent.

Rent portion is calculated initially and annually in accordance with the Housing Choice Voucher (HCV) Administrative Plan. Verification of income will be done according to the HCV

Administrative Plan except that third party verification will be the preferred method since EIV is not available for this program. Rent Calculations are rounded to the nearest dollar.

Decreases in income will result in a decrease in rent portion as described in the HCV Administrative Plan.

Increases in income will be calculated in accordance with the HCV Administrative Plan.

Verification of Income will be done according to the HCV Administrative Plan with third party verification being the preferred method of verification.

UTILITY RE-IMBURSEMENT:

When the calculation of rent portion results in the participant receiving a utility re-imbusement, the CDA will send the utility re-imbusement directly to the utility company. For further policies on utility re-imbusement please see the HCV administrative plan.

EDUCATION:

All families who are receiving rental assistance under Shelter Plus Care will be informed of the McKinney Vento Act to ensure that their children are able to maintain enrollment in school. Supportive services staff from Canvas Health and St. Andrew's Resource Center will advocate for the family with their school district when necessary to ensure that transportation is arranged. If attendance becomes an issue for the children, supportive services staff will be involved to help problem solve around any barriers that are contributing to absences. Supportive services staff will include education related goals for all family members when completing Housing Goal Plans in order to ensure that all family members are connected to relevant educational resources in the community. Homeless families with children ages 3-5 will be encouraged to apply for the Head Start Program and will be provided with referrals to agencies that offer Head Start, such as the CAP agency. Families will be assisted with the application process as needed.

FRAUD:

Instances of fraud as described in the HCV administrative plan will result in termination of assistance and program participation. (e.g. unreported household members, unreported income)

SECURITY DEPOSIT:

The CDA may pay security deposits for participants totaling up to 1 month's rent. Security deposits must mirror unassisted tenants unless needed because of poor rental history. When the tenant vacates a unit and the security deposit remains, or any portion thereof, the security deposit will be refunded to the tenant if the CDA provided it initially.

PROPERTY DAMAGE CLAIM:

Property damage claims for repair of unit after the participant has vacated the unit can be made to the owner. Claims may be paid for one month's rent in excess of the security deposit. The Sponsor will need to provide proof of damages and receipts. A letter delineating the cost of repair and the disposition of the security deposit and proof of expenses will be necessary before re-imbusement for items beyond normal wear and tear will be made. Items may be pro-rated due to length of service.

VACANCY PAYMENT:

If the unit remains un-rented after the participant vacates, the CDA may pay up to one month's rent for Vacancy Loss. The Sponsor will need to make written request for payment.

INSTITUTIONAL STAY/TREATMENT:

Rent on a unit can continue to be paid if the participant has been institutionalized for up to 90 days. Medical verification will be sought that states that the participant is likely to return within 90 days to the unit.

MUTUAL RESCISSION:

If the participant and the Sponsor agree to a mutual rescission of the lease, a letter from the Sponsor will be sent to the participant. The letter will state that by signing the mutual rescission the participant is waiving their right to an informal hearing. The letter will also contain the agreed upon move out date. The letter also notifies the participant of their right to an informal hearing if the participant does not agree to the mutual rescission.

NOTICE TO VACATE:

If the Sponsor determines that the participant has violated program obligations or conditions of occupancy, the Sponsor must send a letter to the participant stating the reasons for the notice to vacate. The notice to vacate must also notify the participant of the right to an informal hearing. If the participant signs the notice to vacate, the participant is agreeing to vacate and waiving their right to an informal hearing. The letter will also contain the vacate by date. The letter must notify the participant of their right to an informal hearing if they wish to contest a vacate notice or termination.

TERMINATION OF ASSISTANCE/INFORMAL HEARING/UNLAWFUL DETAINER:

A participant may be terminated from the program for violations of the program or conditions of occupancy.

If the participant refuses the mutual rescission and the Sponsor maintains that the participant must vacate, then the participant may request in writing an informal hearing. The Sponsor must notify the participant of their right to an informal hearing to contest a termination, mutual rescission or a notice to vacate. The Sponsor must notify the CDA that the participant is exercising their right to an informal hearing. The CDA will carry out the informal hearing as described in the HCV Administrative Plan. The Sponsor will be present at the informal hearing and provide material evidence as to violations of the program or conditions of occupancy. If the informal hearing officer upholds the participant's termination from the program, the participant will be required to vacate. If the participant refuses to vacate, the Sponsor will file an unlawful detainer to re-gain possession of the unit.

LOSS OF PROGRAM FUNDING:

If the Shelter Plus Care rental assistance grant amount is reduced to a point that the number of units under Master Lease cannot be maintained, then this policy will be used to reduce the number of units. Units will be reduced in the order that they were placed under Master Lease. The most recent units would be terminated first. Affected families would be given a 60 day

notice and may choose to maintain their housing by continuing the lease but with full responsibility for the entire rent. If the number of units must be reduced after all master leases have been terminated, then the Sponsor- owned unit with the most recent lease will be the first unit to be terminated until the budget is balanced.

CONFIDENTIALITY:

All Participant Files will be held as confidential information. Releases will allow Canvas Health and the Washington County CDA to share information. The Washington County CDA keeps all participant files in locked drawers with access limited to workers involved in the program. The Washington County CDA follows the same procedures as outlined for the HCV program.

FAIR HOUSING:

The Washington County CDA and Canvas Health will comply with all civil rights laws including, but not limited to, The Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 and title II of the Americans with Disabilities Act.

OTHER:

For other relevant policies please see the HCV Administrative Plan

PART V: BRIDGES I AND BRIDGES II

19-V.A. OVERVIEW

Bridges I and Bridges II serve persons with serious mental illness. The CDA administers the housing subsidy portion of this program. Bridges I is funded by the Minnesota Housing Finance Agency and Bridges II is funded by Washington County Adult Mental Health funds. The Washington County Adult Mental Health Department coordinates the support services for the clients. Participants contribute at minimum 30 percent of their income and at maximum 40 percent of their income toward rent depending upon the Payment Standard. Unlike HCV tenants, Bridges participants cannot exceed 40% of their monthly income for their rent portion. If the rent increases to the point where the tenant would be required to pay more than 40% of their income to the rent then the tenant would be required to move. These programs provide a temporary subsidy that “bridges” the gap between homelessness, treatment centers, institutional facilities and permanent affordable housing. The Minnesota Housing Agency’s Bridges Rental Assistance Program Guide are the policies that govern both program.

The CDA will apply the policies in Plan when not addressed in the Bridges Rental Assistance Program Guide or in areas the guide references the use of the administrators’ Housing Choice Voucher policies. Specifically, the CDA will follow this Plan’s policies for HQS inspections, payment standards, informal hearings, verifications, subsidy standards, and rent reasonableness. Shared units are not allowed under the CDA’s HCV program and therefore are not allowed in the Bridges program.