

Miami-Dade Homeless Continuum of Care Rapid Re-Housing Standards of Care and Policies

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I. PURPOSE OF CoC RAPID RE-HOUSING PROGRAMS

The Miami-Dade County Homeless Continuum of Care Rapid Re-Housing (RRH) Programs provide financial assistance and services to help individuals and families who are experiencing homelessness to be quickly re-housed and stabilized. Based on a determination of need, such assistance may be in the form of move-in expenses, limited rental assistance, housing search and placement assistance, and housing stability case management.

Such programs are operated by local community-based agencies and supported by multiple funding sources. Access to Miami-Dade County's CoC [Rapid Re-Housing](#) (RRH) Programs is coordinated through the Miami-Dade County Homeless Trust's Coordinated Entry System (CES) as described below.

The Providers currently **funded under the CoC program** to provide RRH are:
Carrfour Supportive Housing
Douglas Gardens Community Mental Health Center

The Providers currently **funded under the ESG program** to provide RRH are:
Miami-Dade Community Action and Human Services Department (CAHSD)
Camillus House
Chapman Partnership
Citrus Health Network

The Providers currently **funded under the ESG program to provide Homeless Prevention** are:
Camillus House, and
Citrus Health Network, and
Legal Services of Greater Miami

The Standards of Care for the provision of RRH Programs funded by and/or through the Miami-Dade County Homeless Trust (Homeless Trust), Miami-Dade Public Housing and Community Development (PHCD) the City of Miami and the City of Hialeah are set forth below with the exception of SHIP and joint component projects.

II. RAPID RE-HOUSING SCREENING, REFERRAL, HMIS PARTICIPATION AND CONFIDENTIALITY PROVISIONS

Per HUD regulations (§ 578.23(c)(9) for CoC and § 576.400(d) for ESG) [all CoC and ESG programs \(except victim services providers\) are required to participate in \(accept referrals from\) coordinated entry, which utilizes standardized assessment, prioritization, and referral processes for all people experiencing or at risk of homelessness within the CoC's geographic boundaries.](#)

A. Assessment

Homeless families and individuals seeking assistance will be assessed at Coordinated Entry access points using universal assessment tools such as the HUD Universal Data Elements (UDEs) captured at program entry; VI-SPDAT, F-VI-SPDAT and TAY-VI-SPDAT vulnerability assessments; and through customized CES assessments compiled by CoC access points. Information from the client assessment will be used to prioritize households for available resources according to the prioritization standards outlined in Section B, below.

B. Prioritization Standards

The CES utilizes a combination of data elements collected in HMIS to prioritize persons experiencing homelessness for CoC assistance. Prioritization factors for Rapid Re-Housing, as outlined in the CoC's approved Coordinated Entry Policies and Procedures document, are as follows:

Tier 1 includes:

1. People aged 65+
2. People with medical vulnerabilities

Tier 2 includes:

1. a. People experiencing chronic homelessness OR
1. b. Length of time homeless, cumulative over time is greater than 400 days OR
1. c. Current episode exceeds 300 days
2. People with high crisis system utilization (i.e. justice system or foster care)
3. VI-SPDAT score (greater than 4)
4. People fleeing DV, human or sex trafficking
5. People experiencing unsheltered homelessness
6. Youth/young adults age 18-24
7. Highly vulnerable families (VI-SPDAT score greater than 7)

To assist the CoC with appropriate referral matching, the ranking will also filter for data elements such as disability, household type, chronic homelessness, veteran status and geographic area at system entry.

C. Documentation Standards

RRH providers must use and maintain universal tools provided in HMIS. HMIS Universal Data Elements are reviewed at intake or project entry, no less than annually, and at program exit. If the RRH provider obtains required documents after accepting the client, they must complete the document ready assessment in HMIS and upload the documents onto HMIS.

Providers must have Homeless Trust approval on other tools used to assess households referred to RRH and communicate with landlords and tenants. Below is a detailed description of the minimum information and standards required for each tool. The Homeless Trust can provide examples of these tools at the provider's request.

- **A Rental Assistance Agreement or Landlord-Tenant-Case Manager Communication Agreement**
 - Must be signed by tenant, case manager and landlord
 - Must have contact information for the case manager
 - Must show who is responsible for the rent over a 12-month period, with details separating the program and the tenant’s responsibility
- **Lease**
 - The lease is most often generated by the landlord, but programs can provide a lease template in the event the landlord yields that responsibility to the provider.
 - For instances where the provider enters into a master lease agreement, the provider must provide the master lease and sub-lease with the tenant as part of the initial reimbursement request.
- **Rent Reasonable Analysis**
 - Providers are permitted to hire a third party to perform rent reasonable analysis
 - Providers who perform their own rent reasonable analysis must develop a tool that shows at least two rent comparables for the rent being requested.
 - Providers cannot exceed reasonableness of comparables in rental assistance payments
 - The CoC requires that disabled households seeking bridge housing because their income is insufficient to pay for the contracted rent, not exceed the FMR

D. HMIS Participation and Confidentiality

All providers of RRH assistance, including non-CoC and ESG funded providers supported by and through the Trust, must participate in the Miami-Dade County Homeless Trust HMIS under an HMIS Participation Agreement and subject to the HMIS Standards, Policies and Procedures, to include confidentiality policies.

III.

REFERRAL, DOCUMENTATION AND ASSESSMENT REQUIREMENTS

A. Referral Process

Referrals to the CoC RRH Program, including ESG and other RRH sources funded by and through the Trust, are made through the CoC CES and Homeless Trust Housing Coordinator. In the event that an applicant resides in a CoC emergency or transitional program or is receiving services from a street outreach team, the respective program assists the applicant in completing and submitting the required documents for permanent housing. Otherwise, the CoC RRH Program will assist the applicant in collecting required documentation.

B. Assessment for Level of RRH Assistance

Upon application, all households will be provided sufficient rental assistance to ensure rent is paid until the financial assessment of needs is completed. RRH programs must complete the financial assessment of need using the documents highlighted in the Required Document List and develop a written plan with the participant that outlines the provision of future rent and support services. RRH programs cannot exceed 24 months of rental assistance* during a three-year period, and case management services can extend for 6 months after rental assistance is provided.

The CoC encourages that a financial assessment of need is conducted at least quarterly, although all programs must assess participant income at least annually. Programs such as ESG which limit the household income may not provide financial assistance to households who exceed the

regulatory requirements after a financial assessment has been conducted. Programs are required to provide an adequate level of mobile case management and housing navigation services to ensure participants find housing quickly and are connected to resources that promote housing stability.

Applicants expected to need long-term rental assistance and services in order to maintain housing stability based on initial and ongoing assessments should be monitored by the CoC RRH provider - and bridged to PSH or other long-term housing and supports as appropriate and available.

* *Maximum rental assistance for ESG-CV-funded RRH may be less than 24 months, depending on date of substantial amendment review. See <https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-Grants-Management-ESG-CV-Notice-Summary.pdf> for details.*

IV. TERMS OF RRH ASSISTANCE

The following chart describes the Miami-Dade County CoC’s general local standards for assistance for CoC, ESG, and ESG funded through the CARES Act (ESG-CV) RRH programs. Please note that some funding sources have additional limitations, requirements, expenditure deadlines, and other rules. Providers are responsible for ensuring that they administer RRH assistance in accordance with the regulations outlined by the funder.

For more information see:

- ESG CV Notice: <https://www.hud.gov/sites/dfiles/OCHCO/documents/20-08cpdn.pdf>
- HUD CPD COVID Waivers: <https://www.hud.gov/sites/dfiles/CPD/documents/CPD-COVID-19-Waiver-3-Final-Clean.pdf>

A. Standards for Assistance

Rapid Re-Housing Programs	
Income Limit	Household must be below 30% AMI at reassessment
Additional Eligibility Criteria and Triage	<p>Upon referral for CoC RRH, applicants will be further assessed using the CoC RRH Triage Tool (<i>Attachment B</i>) to determine the length of rental assistance and level of housing stabilization and relocation services.</p> <p>Applicants determined to likely have needs for ongoing rental assistance and services, will be monitored by the provider and CoC and referred to PSH or other long-term supports as appropriate and available.</p>

<p>Form of assistance available and maximum period of assistance.</p>	<p><i>Housing Stabilization and Relocation Services:</i></p> <ul style="list-style-type: none"> • Case Management and Housing Search • Application Fees <p><i>Rapid Re-Housing Rental Assistance:</i></p> <ul style="list-style-type: none"> • Security Deposits • Moving Costs • Utilities and Utility Deposits • Rental Assistance up to Twelve Months* <ul style="list-style-type: none"> ○ After the third month, the program will make a determination whether the participant requires continued assistance. ○ Under extenuating circumstances, based on evaluation of need, rental assistance can be extended as necessary beyond the initial period of assistance, but no longer than 24 months. * <p>* Note: ESG-CV funds may be limited to 12 months, depending on date of substantial amendment review.</p>
<p>The percentage of rent and utilities each program participant must pay toward rent.</p>	<p>Tenant contributions to rent should be based on the income and circumstances of each household. When possible, providers should work with tenants to use a declining subsidy, in which the tenant gradually pays a higher percentage of the rent until they can pay the full amount. In the case of tenants expected to have needs for a bridge to PSH or other housing options, because their household income is below or less than 120% of the contracted rent, providers may consider a consistent subsidy with a tenant portion calculated based on income.</p> <p>Example**</p> <p>Months 1 & 2: Client pays 0%; Program pays 100%</p> <p>Month 2 financial assessment and written plan conducted</p> <p>Month 3: Client pays 25%; Program pays 75%</p> <p>Month 4 & 5: Client pays 50%; Program pays 50%</p> <p>Month 6: Client pays 75%; Program pays 25%</p> <p>** Unless tenant documentation (financial or issues identified through Triage Tool) supports the program provides a larger % of rent assistance, such as the difference between 30% of the tenant's income and the rent amount, or provides additional months of rent assistance using a declining subsidy.</p>

B. Standards for Re-Evaluation of Assistance

The RRH program will not offer assistance beyond twenty-four months. * However, in accordance with HUD regulations, CoC RRH providers must conduct regular re-evaluations, at least annually, of program participants receiving RRH assistance. To continue to receive CoC RRH assistance, a program participant's re-evaluation must demonstrate eligibility based on:

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

***Note: ESG-CV funds may be limited to 12 months, depending on date of substantial amendment review**

V.**RRH HOUSING PLANNING, CASE MANAGEMENT AND SERVICES****A. Housing Plan and Case Management Requirements**

1. The objective of the RRH Program is to ensure that assisted households can maintain long-term housing stability following the withdrawal of monetary assistance and services, or to stabilize households experiencing homelessness and offer appropriate support until they can bridge to PSH or other long-term supports.
2. A **Housing Stability Plan (HSP)** must developed no later than **21** days of the RRH referral; the RRH provider will assist the participant in making an assessment of issues and barriers to their own housing stability and assist the participant in developing their plan to achieve housing stability during the period of RRH assistance. CoC RRH programs must outline goals and objectives to be performed, responsible parties, set target dates, review the plan at least quarterly and have the participant and their case manager sign the plan and its revisions.
 - a. Housing stability planning must be conducted utilizing a client-centered approach.
 - b. The Housing Stability Plan must specify how the tenant will retain permanent housing and assume responsibility for the full rent amount after RRH assistance ends. The plan must take into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive, which may include bridge housing to PSH; the relative affordability of available housing in the area and supportive services necessary to overcome barriers to housing stability. The Plan must also assess the household's budgeting skills and measures to improve such skills as necessary.
 - c. The RRH provider must assist the participant to develop a client-driven services plan and connect the participant to appropriate supportive services including medical care, mental health services, substance use treatment, counseling, employment, support for Activities of Daily Living (ADLs), and any other services essential for achieving independent living; as well as government and private benefits and financial assistance including, but not limited to Medicaid; SNAP; WIC; unemployment; SSDI/SSI, Food Stamps.
3. Assigned Housing Navigators will assist households in locating rental properties that meet FMR (as defined in VI. B. below) and within the household's current or projected budget. Households will be placed ideally within **45** calendar days of referral.
4. Selection of a housing unit is based on participant's choice; however, the participant must select and move into an HQS-approved unit within 45 calendar days of the date of Program's written approval of assistance. Failure to do so may result in the withdrawal of the opportunity for assistance.
5. At least once a month, case managers will document individualized follow-up with clients. Case management is conducted, where no less than four follow-ups must be face-to-face home visits or via phone/video when home visits are unsafe (i.e.: due to the COVID19 pandemic); however, such visits may be made more frequently as needed, by tenant request or permission to assist the household in making progress toward housing stability.

B. Time Limitations on Rent Assistance and Support Services

1. CoC-Funded RRH Rental Assistance

RRH rental assistance is based upon the needs of participants to reach stabilization and can be provided up to 24 months* within a three--year period.

*Note: ESG-CV funds may be limited to 12 months, depending on date of substantial amendment review

2. CoC-Funded RRH Services

COC RRH-funded case management and supportive services may be provided until 24 months total or up to 6 months after RRH rental assistance is discontinued.

C. Staff Competency

CoC RRH staff must have proper training as well as supervision necessary and appropriate to the job function(s) with which the staff members are entrusted.

D. Non-Discrimination in Provision of Services

There shall be no discrimination on the basis of race, color, gender identity, sexual orientation, disability, religion, or national origin in the provision of services to participants by participating CoC agencies. No religious practice or affiliation requirement shall be imposed upon participants.

Providers shall demonstrate sensitivity to participants' primary language and cultural background.

Steps and Timeline for Referral to RRH	
HT initiates referral and issues referral to provider	1 working day
Provider screens for eligibility and advises HT of referral disposition. Accepted client entered into HMIS. Denied clients also entered into HMIS as detailed in Rejection of Referrals Policy.	7 working days
Housing Navigator assists client in identifying housing	Up to 20-30 working days
Rent Reasonableness Analysis conducted	2 working days
Housing Quality Standards (HQS) or ESG Minimum Habitability Standards inspection is performed	2 working days
Provider secures lease or rental assistance agreement <u>AND</u> CoC Landlord, Tenant and Case Manager Communication Agreement	1 working day
Total # of Working Days	33-43

VI.**RRH PROGRAM RENT REQUIREMENTS****A. CoC Rent Limit**

The rent for the assisted unit must meet HUD's rent reasonableness standard. The CoC requires that disabled households seeking bridge housing because their income is insufficient to pay for the contracted rent, not exceed the FMR.

B. Rent Reasonableness Standard

The rent for a unit proposed for assistance must be compared to the rent charged for comparable units in the same market area. Comparison of the proposed rent must be based on location, quality, size, unit type, age, amenities, housing services, maintenance and utilities that must be paid for by the tenant.

C. Calculating Rent

In all cases in which the participant is required to pay a portion of rent, for purposes of calculating rent, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by Miami-Dade County for the area in which the housing is located.

VII.**RRH LEASE AND RENTAL AGREEMENT REQUIREMENTS****A. Property Owner Rental Assistance Agreement**

Any unit that receives rental assistance payments through rapid re-housing must have a rental assistance agreement between the CoC RRH program paying the rent assistance and the property owner (or management company authorized to enter into the agreement and take payments on behalf of the owner).

The CoC RRH providers must use the following.

- ***A Lease and***
- ***A Rental Assistance Agreement or Landlord, Tenant and Case Manager Communication Agreement outlining the rent provided, who is responsible for what portion of the rent for every month assistance is rendered, and signed by the case manager, tenant and landlord.***

B. Lease Between Property Owner and Participant

The participant must enter into a lease with the property owner. Although CoC RRH assistance is short to medium term rental assistance, the lease between the owner and participant must be for a term of not less than one year.

VIII. RRH INSPECTIONS

A. Inspection Standards

CoC units must pass HUD Housing Quality Standards found at 24 CFR § 982.401. HUD has provided additional guidance with regards to HQS standards. Checklist Form 52580 insufficiently reviews the fire safety protocol. Providers using HQS must use an addendum to meet this standard where both these conditions are met:

- a. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing-impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.
- b. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, day care centers, hallways, stairwells, and other common areas.

Housing Quality Standards (HQS) used for other HUD programs are different than the minimum standards for permanent housing and emergency shelter assisted with ESG funds. ESG providers, especially in cases bridging to PSH, may choose to use HQS standards with amended review of fire safety protocols.

ESG providers cannot use ESG funds to help a program participant remain in or move into housing that does not meet the Minimum Habitability Standards found at 24 CFR § 576.403 and must document compliance with the applicable standards.

Note: Although the minimum standards do not cover lead-based paint requirements, providers must follow the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R, with respect to shelters assisted under ESG and housing occupied by program participants.

IX. ACCEPTANCE, DENIAL OR TERMINATION OF RRH ASSISTANCE

A. Acceptance of RRH Referral

The CoC Housing Coordinator will send electronic referrals via HMIS and an accompanying email to all RRH providers.

- Providers must complete the referral disposition in HMIS after screening the client, ideally within 7 days from the referral receipt.
- If the client is accepted by the program, they must be enrolled within the provider's RRH program in HMIS at this time.
- HMIS must be updated with a move-in date once the client executes the lease and moves into the dwelling.
- Program exits from HMIS are completed for clients who fail to move-in or when rental assistance is no longer provided.

B. Denial of RRH Assistance

Per the Rejection of Referrals Policy detailed in the CoC's CE Policies and Procedures document, RRH providers can deny a referral if the household is *ineligible* for the program based on program eligibility requirements.

Denials should be infrequent and the reason for denial from HMIS participating programs must be documented in HMIS as detailed in the Rejection of Referrals policy.

Aggregate counts of service denials by providers, categorized by reason for denial, may be reviewed by the Homeless Trust annually as part of the competitive process and monitoring.

C. Termination of RRH Assistance

To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

1. Housing First principles promote low barrier intake processes. If your Rental Assistance program has program rules, the project must:
 - a. Provide the rules to the Homeless Trust for review
 - b. Provide the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
2. Written notice to the program participant containing a clear statement of the reasons for termination;
3. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
4. Prompt written notice of the final decision to the program participant.

Note: Termination under this section does not bar further assistance at a later date to the same family or individual.