

# Boston Continuum of Care Written Standards

## Continuum of Care (CoC), ESG-CV and City-funded Rapid Re-Housing

### Vision Statement: Boston CoC's Rapid Re-Housing

The Boston CoC's Rapid Re-Housing programs are poised to end homelessness by increasing placements to permanent housing and narrowing the pathway to chronic homelessness. The success of our Rapid Re-Housing efforts will be measured by the system goals of:

- A decrease in length of stay in Boston shelters (or outside), and
- A reduction in the annual Point In Time (PIT) Count of literally homeless households in Boston.

### Policies and Procedures for Evaluating Household eligibility for assistance

*Eligible Participants:* Boston residents who fit the following categories of the HUD HEARTH Homeless Definition:

- HUD Category 1, Literally Homeless definition, as follows:

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. Rapid Re-Housing programs *funded by the CoC program* **cannot** serve those in transitional housing due to restrictions set forth by HUD in the NOFA. City-funded and ESG-funded RRH may serve those in transitional housing.

- HUD Category 4, Fleeing or Attempting to Flee Domestic Violence, as follows:

Any individual or family who: is 1.) fleeing, or is attempting to flee, domestic violence; 2.) has no other residence, and 3.) Lacks the resources or support networks to obtain other permanent housing.

Rapid Re-Housing programs must also adhere to any eligibility criteria that was defined in the Notice of Funding Availability (NOFA) or Request for Proposals (RFP) the program was funded under.

The Boston CoC's governing body retains the right to vote in additional eligibility criteria on an as-needed basis.

## Determining & prioritizing which eligible households will receive rapid re-housing assistance

*Uniform Assessment Tool:* The Boston CoC is currently exploring possible uniform assessment tools for Rapid Re-Housing programs to use to assess eligibility and prioritization for the resource. To establish the assessment pool of participants, the Dept. of Neighborhood Development (CoC lead) will use data from Efforts to Outcomes (ETO), the local HMIS system, to identify those who have been homeless in Boston nine months or longer to complete an assessment with. The assessment tool will focus on assessing one's barriers to ending their own homelessness crisis, and severity of service needs.

*Prioritization of Households for RRH Assistance:* The following populations must be prioritized for Rapid Re-Housing assistance:

- Literally homeless (outside, emergency shelter and/or transitional housing) households with a current episode of literal homelessness in Boston
- Households fleeing or attempting to flee domestic violence with proof of a Boston address ○  
Note- this is only eligible for CoC and City-funded RRH (not ESG)

*Additional Order of Priority if Above Population Has Been Exhausted:* There may be times when the above, prioritized population has been exhausted throughout the system. An example may be if an RRH program has in its grant agreement to serve a specific sub-population (i.e. youth, Veterans, etc.), there may be no one in the sub-population pool who falls within the above category. The Coordinated Entry system may use this additional Order of Priority in those limited circumstances to generate referrals to RRH programs:

### *Evaluating Eligibility*

To evaluate eligibility, programs must obtain proof of eligibility (Category 1 or 4 of the homeless definition), **and** proof of prioritized status (# of Boston bed nights) for those in category 1 (literal homelessness). Please note that households who meet the category 4 definition of homelessness (fleeing domestic violence) must document that they meet Category 4 eligibility and have proof of a Boston address, but do not need to document the number of bed nights in HMIS. Below are the instructions for evaluating eligibility and prioritized status for both Category 1 and Category 4 participants.

- Category 1, Literally Homeless: Participants must have documentation -  
Revised 6/14/2021

- DND's preferred Order of Documentation is:
  1. HMIS record of the # of Boston bed/outside nights specified above
  2. Third-party written documentation
  3. Oral verification to the intake worker (written by the intake worker)
  4. Intake worker written observation of one's homelessness
  5. Self certification from the participant- there is a 25% cap per project per program year for self certifications
- If you are using documentation methods #2-5 above, programs must ensure documentation contains:
  1. The dates of the Boston bed/outside nights being verified
  2. Explanations for why staff had to use a lesser preferred method of documentation

- Category 4, Fleeing or Attempting to Flee Domestic Violence- Participants must have documentation of ○ An oral statement by the participant that states they are fleeing DV; they have no subsequent residence; and they lack resources to obtain other housing- this statement must be documented through an intake worker or self-certification

- Non-Victim Service Providers must additionally verify that the participant is fleeing DV if the participant's safety would not be jeopardized using HUD's preferred order of documentation:
  1. Third-party written documentation
  2. Oral verification to the intake worker (written by the intake worker)
  3. Intake worker written observation of one's homelessness
  4. Self certification from the participant (the 25% cap on self-certifications does not apply to Category 4 participants)
- Category 4 participants must also have documentation in the file of proof of a Boston address

*RRH Co-Enrollments:* The Boston CoC is currently considering guidelines around co-enrolling participants in multiple Rapid Re-Housing programs. These guidelines may be reflected in future drafts of these written standards.

## Standards for determining what percentage or amount of rent each RRH program participant must pay

The Boston CoC endorses the use of a progressive engagement approach as programs determine the percentage/amount of rent each RRH program participant must pay while enrolled. Participants are required to pay a **minimum** of 30% of their monthly gross income towards rent, when receiving ongoing rental assistance through a rapid re-housing program. Programs will consider reasonable monthly utility costs, as described in CPD 17-11, when calculating rent contributions for program participants who are responsible for paying their own utilities.

Please note that ongoing rental assistance does not include upfront moving costs such as first month's rent, last month's rent, security deposit and moving assistance. Using a progressive engagement approach, programs are expected to provide the least amount of assistance possible during any given month to stabilize the housing situation; this may mean participants are paying a percentage higher than 30% of their income towards rent from the beginning of their program enrollment. Some of the key principles of progressive engagement are that:

- As much as possible, the participant will cover most or all of the full rent from the start of the tenancy.
- Participants are assessed each month to increase or decrease assistance, based on housing stability.
- The least amount of assistance possible is used to stabilize a housing situation.

3

The Boston CoC recognizes there may be rare instances where a participant's housing stability is jeopardized by paying 30% of monthly gross income towards rent. In these instances, a program may allow a participant to pay less than 30% of monthly gross income towards rent for the first 6 months of program enrollment. Programs are required to provide an explanation and/or documentation of why the participant's rent is calculated at less than 30% of gross income.

## Standards re: length of time of rental assistance and services

*Maximum # of Months- RRH Services and Financial Assistance:* Rapid Re-housing programs have flexibility on how long participants may receive services and/or financial assistance from Rapid Re-Housing programs to promote housing stability. CoC-funded programs have a cap on financial assistance of a maximum of 24 months and a cap on services of 6 months after rental assistance stops; for example, if someone received the full 24 months of rental assistance, s/he could receive 6 additional months of supportive services only, resulting in 30 months of services. The City-funded

programs do not have a cap.

*Maximum # of times Participants May Re-Enroll into RRH:* There is no defined cap on how many times a participant may re-enroll into rapid re-housing programs. However, if a participant does lose housing that was obtained through a rapid re-housing program and becomes literally homeless again, programs are required to conduct an assessment and put forth an effort to connect the participant with other appropriate housing interventions. Appropriate housing interventions may include providing rapid re-housing for a longer length of time paired with higher intensity supports, bridging to a permanent housing placement, or pursuing mainstream housing resources.

#### *Re-Evaluation of Services and Rental Assistance*

All Rapid Re-Housing programs are required to re-evaluate participants' need for Rapid Re-Housing assistance on an annual basis. The assessment must include the following:

- An evaluation that the participant lacks sufficient resources and support networks necessary to retain housing without Rapid Re-Housing; in other words, the participant would be homeless, "but for" Rapid Re-Housing assistance.
- An evaluation of the participant's service needs, with a plan to adjust any services accordingly.

Documentation of the annual evaluation must be present in participant files.

#### *Standards for Providing RRH Supportive Services/Case Management*

The following are the minimum expectations for providing supportive services to Rapid Re-Housing participants:

- *Meeting Frequency:* A minimum of one meeting per month is required for as long as a participant is receiving financial assistance or rapid re-housing supportive services. Please note that services may be provided for a maximum of 6 months after financial assistance ends to transition participants off the program.
- *Meeting Type/Format:* For those Rapid Re-Housing participants who have been receiving services or financial assistance for 6 months or more, programs are required to conduct a quarterly home visit beginning at month #6 to evaluate housing stability and provide support to participants.

Additionally, programs are encouraged to use the progressive engagement approach of decreasing or increasing the intensity of services, based on participants' housing stability.

## **Transferring Existing Rapid Re-Housing Participants to ESG or ESG-CV Rapid Re-Housing for Continued Assistance**

Participants can transfer from another RRH source to ESG or ESG-CV, based on new waiver flexibility released by HUD: <https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-05cpdn.pdf>. Below the parameters of when RRH transfers to ESG or ESG-CV may happen. The HUD Waiver allows ESG or ESG-CV to accept transfers from other RRH by allowing people in other RRH to maintain their homeless status for ESG or ESG-CV.

- It does not work in the opposite direction- for example, CoC RRH that requires homeless status cannot use this waiver and accept a transfer.

- This waiver is retroactive as of Jan 21, 2020 and lasts until ESG-CV ends- 9/30/2022, unless otherwise noted by HUD.

**To transfer from another RRH source to ESG or ESG-CV, providers must document all of the following in a participant's file:**

1. Participant was literally homeless in Boston (unsheltered, emergency shelter or transitional housing) immediately prior to moving into unit
  1. *YHDP and DV or other RRH programs that serve category 4 will have limitations on which participants can use this*
2. Participant has been using time-limited rental assistance from another program
  1. This includes any federal or local rental assistance reserved for people "who are homeless". Examples in Boston include CoC, YHDP, SSVF, City-funded RRH, state-funded RRH or rapid transition funds and Barrier Buster.
3. Would not overlap in rental assistance between the first RRH program and ESG
4. Would not have a gap of more than one month of rental assistance between the end of the other funds and the beginning of ESG
5. The participant does not have the resources or support networks to retain existing housing without moving to ESG. This includes completing the Housing Stability Options Checklist for each participant, attached at the end of this document.
6. May transfer to ESG/ESG-CV without doing a housing habitability check on the existing unit if you document....
  1. The previous RRH provider's housing habitability or HQS report on the unit OR
  2. The ESG assistance will be 90 days or less OR
  3. The ESG provider conducts an inspection within the first 90 days and determines the unit meets habitability
7. The participant may not receive more than 24 months of rental assistance or case management from ESG or ESG-CV in a three year period.
  1. *Note: If you are transferring from ESG to ESG-CV, a participant may not receive more than 24 months of rental assistance or case management TOTAL between the two programs. HUD looks at all ESG funds as one source of funds.*

### **Referral Logistics to Transfer Participants to ESG or ESG-CV**

- Providers who administer ESG or ESG-CV and another RRH funding source may transfer to their own ESG or ESG-CV program as long as transfers do not reduce the housing placement contract goal in the ESG contract to house people directly from unsheltered or sheltered situations.
- Providers may seek additional funding from DND to expand contracts to accommodate both transfers and maintain the original housing placement goals.
- If you are an RRH provider who does NOT administer ESG or ESG-CV to transfer participants to, email Anna Rodriguez - [arodriguez@stfrancishouse.org](mailto:arodriguez@stfrancishouse.org) at St. Francis House to have your client enroll in the SFH RRH program. If SFH does not have capacity, please contact Ian Gendreau at [ian.gendreau@boston.gov](mailto:ian.gendreau@boston.gov) to explore if

there are ESG/ESG-CV RRH programs to transfer to at other agencies.

### HMIS Guidance: For ESG/ESG-CV programs accepting RRH transfers

- How does the receiving RRH program enter exit destination
  - Exit to the **actual destination** that the household is leaving to - in the case of an RRH to RRH xfer, it's usually "Rental by client, with RRH or equivalent subsidy".
- How does the receiving RRH program categorize prior living situation?
  - Same, use the actual living situation. This will make your reports say the person is ineligible- this is true. There are times when project eligibility criteria and data collection standards don't perfectly align - this is one of them. Always use the actual living situation, and explain that in the notes section of any required reporting (APR/CAPER).
- What is the “move-in date” when we enroll the household into the receiving ESG/ESG-CV program?
  - Each project enrollment has one move-in date - the purpose of that data element is to differentiate between when someone is homeless and housed. In the case we are talking about here, they would have a housing move in date for the receiving project that is **equal to the project start date**.

### Attachment: Housing Stability Options Checklist

The purpose of this checklist is for RRH staff to document all other efforts that are being pursued so that as a system we use our limited rapid re-housing and permanent supportive housing for people who have no other options to avoid literal homelessness.

### Supportive Services (Permanent/non-time limited)

\_\_\_ Participant has obtained CSPECH or other supportive services through their health plan

If no, discuss why this is not an option:

---

\_\_\_ Participant has obtained permanent supportive services from a community-based agency (i.e. Eliot recovery coaches, independent living centers, etc.)

If no, discuss why this is not an option:

---

\_\_\_ Participant has obtained a rep payee or other assistance to pay rent portion on time every month.

If no, discuss why this is not an option:

---

### **Subsidized Housing Applications**

\_\_\_ Participant has applied and knows how to retain homeless status at BHA

If no, discuss why this is not an option:

---

\_\_\_ Participant has applied for subsidized housing outside of Boston

Specify where the participant has applied:

---

If no, discuss why this is not an option:

---

\_\_\_ Participant has applied for specialized housing, including nursing homes, rest homes, community-based housing for those at risk of institutionalization and 811 for those at risk of homelessness or institutionalization

If no, discuss why this is not an option:

---

### **Less Expensive Housing Options**

\_\_\_ Participant has pursued adding roommates or moving in with roommates to lower the cost of housing

If no, discuss why this is not an option:

---

\_\_\_ Participant has considered less expensive units (smaller, farther away from Boston, etc.) to lower the cost of housing

If no, discuss why this is not an option:

---

\_\_\_ Participant has pursued a plan to move in with friends, family or relocate and leave the rapid re-housing program.

If no, discuss why this is not an option:

---

\_\_\_ Participant has pursued homelessness prevention funding in their city/town to extend time of financial assistance.

If no, discuss why this is not an option:

---

### **Income and Assets**

\_\_\_ Participant has used income maximization services to increase benefits and/or increase income

If no, discuss why this is not an option:

---

\_\_\_ Participant has applied for and received SNAP benefits

If no, discuss why this is not an option:

---

\_\_\_ Participant has applied and received all utility discounts (electric, heat, phone, internet)

If no, discuss why this is not an option:

---



## Income and Assets (continued)

\_\_\_\_ Participant has applied and received all utility discounts (electric, heat, phone, internet)

If no, discuss why this is not an option:

---

\_\_\_\_ Participant knows how to and currently obtains free resources to lower budget- food, clothes, toiletries, etc.

If no, discuss why this is not an option:

---

## Housing Stability Plan

Based on the above checklists, describe the plan to assist the participant in maintaining housing stability.

---

---

---

---

---