RAPID RE-HOUSING (RRH) PROGRAM STANDARDS

Introduction

In Sonoma County, Rapid Re-Housing (RRH) has been adopted as a critical strategy for ending homelessness. **Housing First**, as a strategy to end homelessness, has been promulgated by all federal funders as the most cost effective strategy to end homelessness, and as a result has been gaining support with the Sonoma County Continuum of Care Homeless (CoC) providers.

This document provides guidelines for operating local RRH programs. Although RRH programs are funded under various federal regulations, these standards have been developed using the federal ESG Interim Rule as primary guidance. Future iterations will work to align these standards with additional funding streams. Providers working collaboratively on these standards have also contributed their own best practices to its development. In addition, we have incorporated program practices using the mandated Homeless Management Information System (HMIS) processes to develop this document.

The overall goal is to assure compliance for all providers to the highest and most rigorous federal standards while supporting the flexibility needed to accommodate different funding sources. Consistent program delivery will strengthen our local efforts not only to continually receive funding for these programs, to promote continuity of funding and notably reduce Sonoma County's homeless population by providing effective services.

RRH Program Standards Workgroup

The RRH Program Standards Group is composed of providers who receive funding through the following channels: Community Development Commission ESG funding, County of Sonoma Low-Mod Income Housing Asset Funds (LMIHAF), County of Sonoma CalWORKS RRH funding, State of California Housing and Community Development ESG funding, and Veteran's Administration SSVF funding. The workgroup formally meets quarterly for the purpose of updating local RRH policy and to finalize proposed changes to earlier agreements. Meetings requested and/or scheduled in between quarterly meetings will be published to all RRH workgroup members. Discussions that drive proposed changes to the program standards (including recommended working forms) may be finalized in between quarterly meetings if all workgroup members are present OR are contacted and agree to the change.

Changes to the RRH Program Standards will be considered and agreed to by working consensus of providers experienced in RRH Program delivery. Conflicts and/or dissenting opinions will first attempt to be resolved in person. On other issues, working consensus will be the prevailing process for resolving disputes. If no consensus can be gained within two quarterly meetings, the majority vote of the workgroup will prevail.

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Integration with Sonoma County Coordinated Intake

Once local Coordinated Intake (CI) is operational, Sonoma County RRH Programs will receive initial participant referrals from the federally mandated Coordinated Intake (CI) program. Once a provider receives that referral, they are expected to consider program eligibility on the basis of the Service Prioritization and Decision Assistance Tool (SPDAT) vulnerability score combined with information gleaned from the CI case management process. The SPDAT ranking will be combined with a more deeply targeted RRH interview process designed by this workgroup. Should the participant not be enrolled in the RRH program and still meet the federal Homeless Definition, they will be referred back to the Coordinated Intake Program with an accompanying explanation for non-enrollment from the RRH provider.

All Sonoma County Rapid Re-Housing programs will collect and enter data in compliance with the Homeless Management Information Systems (HMIS) federal mandate. Procedural flows and instructions for HMIS compliance are included throughout the RRH Program Standards.

Coordination With Non-RRH Providers

Street Outreach –

I. Until CI begins, outreach workers will refer homeless persons found on the street as quickly as possible and assist with direct linkage to Rapid Re-Housing providers for RRH screening. On occasion this may mean accompanying RRH provider staff with visits on the street.

Prevention and One-Time Financial Assistance Providers –

I. Prescreen households seeking assistance for homeless vs. at-risk housing status. If homeless, screen for RRH with CI screening tool and refer through CI to a Rapid Re-Housing program.
II. RRH Providers will collaborate with agencies providing one-time assistance, for one-time or deposit assistance (e.g., SOS, HCA, SSVF).

Shelter Providers –

I. Until CI begins prescreening for Rapid Re-Housing using the local CI screening tool will be completed and potential participants will be referred to RRH providers as appropriate.

All coordination efforts will aim to avoid duplication of funding and service provision.

Program Design

Evaluating Program Eligibility for Rapid Re-Housing

- Initial Evaluation

Currently RRH providers meet with potential participants and complete a screening and

assessment through use of a provider-designed targeted Rapid Re-Housing tool. At that time, documentation may be collected to further assist the participant with the ability to become housed.

Sonoma County RRH providers will work from the viewpoint of screening people *in* rather than *out.* In doing so providers commit to being good stewards of the funds, acting in the best interest of the client, and with transparency regarding the program limitations.

- Initial Evaluation conducted by Coordinated Intake

Once operational, providers will utilize Coordinated Intake to conduct initial evaluations of applicants to determine baseline eligibility for entry into an RRH program. To do so, CI will combine ESG's regulations for determination of Homeless Status (246.101 ESG Interim Rule) along with consideration of the VI-SPDAT and SPDAT assessment scores to determine those at highest risk of health vulnerabilities.

- Verification of Homelessness

All RRH participants must meet the definition of "literally homeless." Until CI is operational, RRH providers will determine homeless status using the federal definition as follows:

- **Category 1 - Literally Homeless Status:** at the time of intake. HUD defines "Category 1" as:

  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.
  (See:https://www.onecpd.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf)

- **Category 4 – Fleeing/Attempting to Free Domestic Violence:** at the time of intake. HUD defines "Category 4" as:

  (i) Fleeing or attempting to Flee Domestic Violence
  (ii) No subsequent residence
  (iii) Lacks resources to obtain other housing

- RRH Provider Assessment

When Coordinated Intake is operational and prior to final program acceptance from a CI referral, RRH providers shall have an opportunity to meet directly with the Participant Household, to review,

discuss and verify as correct, all data collected through Coordinated Intake (as well as HMIS historical HUD assessment information) in order to make a final determination regarding program enrollment. Should the household be denied enrollment by the provider, they will be informed as to the reason and will be referred back to Coordinated Intake accompanied by an explanation regarding denial of service. This may result in further case conferencing among Coordinated Intake, RRH, and other providers.

- Income Determination: Determination of household income is not a requirement of Rapid Re-Housing program enrollment per the HUD's ESG FAQ #1042 dated December 17, 2012. Once the participant household has been enrolled in an RRH program, full re-evaluation (including determination of current income levels) shall be performed at least annually using the either the Annual or Exit Assessment in the Homeless Management Information System (HMIS). At the time of re-evaluation, if the program participant's household annual income exceeds 30% of Area Median Income (AMI), as determined by HUD, the program participant household must be exited from the RRH program (24 CFR §576.401(b)). Information regarding AMI is included later in this document.

  Locally, the RRH workgroup members are encouraged to assess quarterly income updates using the Periodic Income Update TouchPoint assessment in the HMIS. If it is determined through periodic income updates, that the household's income increases to over 30% Area Median Income (AMI), the provider may, at its discretion, exit the household from program services (ESG FAQ ID 1000 published 12/17/2012).

- Personal Identification Requirement: Coordinated Intake will work with the client to gather the following:

  - Certification of Homelessness status – See attached "Homeless Definition
  - A future iteration of these standards will include a self-certification form for "fleeing from a domestic violence situation."
  - Other Personal identification as needed to assure participant is the person they claim during their intake process, any accompanying child in a family belongs to that family, and the household has met the ability to move into housing – See attached "Acceptable Forms of Personal Identification for Housing Programs."
  - Income documentation, while not a requirement to determine program eligibility, may be reviewed to inform development of the participant's Housing Plan

ESG Eligible Rapid Re-Housing Activities

Activities that may be conducted for Rapid Re-Housing (according to key program regulations found at 24 CFR Parts 84, 85, 91 and 576).

Housing Relocation and Stabilization **Participant must meet with a case manager at least once a month for duration of these assistance types (except as covered by VAWA of FVSP)**	
Housing Search and Placement	Assessment of housing barriers, needs and preferences; development of an action plan for locating housing; housing search and outreach to and negotiation with owner; assistance with submitting rental applications and understanding leases; assessment of housing compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness; assistance with obtaining utilities and making moving arrangements.
Housing Stability Case Management	Working with the CI program to conduct initial evaluation and re-evaluation; working with Agency delivering program services for counseling; developing and securing services including Federal, state and local benefits; monitoring and evaluating participant progress providing information and referrals to other providers and developing individualized housing and service plans.
Mediation	Mediation services between program participant and housing owners, property managers, or person(s) with whom the program participant is living to prevent loss of permanent housing in which they currently reside.
Legal Services	Hourly fees for legal advice and representation; fees based on actual service performed; client intake, prep for cases for trial and counseling and representation at hearings; filing fees and other necessary court costs; landlord tenant matters; child support; guardianship; paternity; emancipation; legal separation; resolution of outstanding criminal warrants; orders of protection and other civil remedies for DV victims including dating violence, sexual assault and stocking, appeals of veterans and public benefit claim denials.
Credit Repair	Services necessary to assist program participants with critical skills related to household budgeting, managing money, access a free personal credit report, and resolution of personal credit problems through credit counseling or other related services. This activity may NOT cover payment or modification of client debt.
	Note: All participants must be assessed for and then assisted as needed to obtain appropriate support services, including mainstream benefits such as Medicaid or MediCal, SSI or TANF.
Rental and Financial Assistance	
Short-term rental assistance	Up to 3 months - total not to exceed 24 months during any 3 year period, including any payment for last month's rent.
Medium-term rental	Up to 3 months - total not to exceed 24 months during any 3 year period,

assistance	including any payment for last month's rent.
Payment of Rental Arrears	One-time payment of up to 6 months on those arrears (including any late fees). Also storage fees in arrears are not eligible.
Combinations of Rental Assistance Types	Total of any rental assistance types may not exceed 24 months during any 3-year period including payment for last month's rent.
Rental Application Fee	Fees charged by owner to all applicants.
Security Deposits	Not to exceed two month's rent – These are NOT allowable under Short/Med Term Assistance.
Utility Payment	Standard deposit required by utility companies for gas, electric, water and sewage (note this activity type does not include cable tv, internet or cell phone charges for the participant).
Moving Costs	Truck rental, hiring moving company, temporary storage not to exceed 3 months provided fees are accrued after participant is deemed program eligible and before participant moves into permanent housing (note may not include funds to generally transport automobiles to new residence – initial move only).
Rental Assistance Paid for Affordable Housing Units	Note: Short or Medium-term rental assistance may be for either Tenant-based or Project-based rental permanent housing types but must comply with FMR limits and rent reasonableness restrictions; be set under a rental assistance agreement guided by a legally binding written lease (unless the assistance is strictly for rental in arrears). Project based must be set an initial term of one year. RRH rental assistance may not be used in combination with other subsidies from any other public source or who are receiving replacement housing payments under the URA (Uniform Relocation Assistance Act), however RRH rental assistance may be used to pay for housing with rent restriction covenants stemming from development financing (i.e. Burbank Housing in Sonoma County).
Deposits and Assistance – Other sources contributing	ESG funds may be used to provide security deposits to help veterans move into units receiving HUD-VASH rental assistance, as long as the security deposit is not being paid for with another source of funds. ESG may not be used to provide rental assistance during the same period of time that HUD-VASH is providing rental assistance for the same participant. (See 24 CFR §576.106). *(Note – various other funding sources may be* ***combined*** *to meet the amount needed for a rental deposit as long as those combined funds do not exceed the total deposit amount).*

Determining Amount and Duration of Rental Assistance

RRH Providers shall meet with each participant household to develop a Housing Stability Plan which will include determining the type, maximum amount and duration of housing assistance for households who enter the program. Providers will factor in total funding availability and the federal

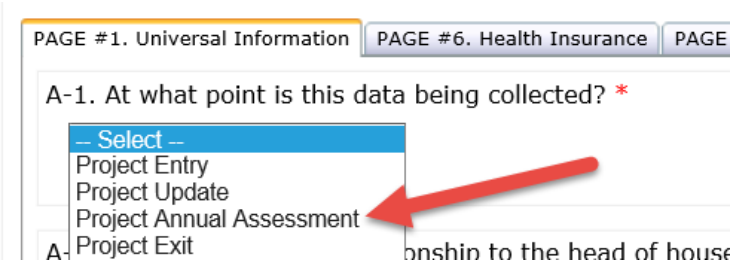
minimum requirements set for case management and re-evaluation, and include disclosure to participants regarding policies and practices if government funding is lost or discontinued. Standards for determining the share of rent and utility costs for each household will observe the following practice:

1. All Participants will work with their provider to develop a program exit strategy which includes plans to reduce financial assistance over time. Practices vary among provider but generally include a way to decline the amount of rental assistance to a household over time. Participants will be made aware and agree to the plan structure before moving into housing. Providers will work through periodic case management sessions to keep participants aware of pending reductions in assistance. Providers also have the option to defer scheduled reductions or increased support temporarily on a case by case basis.

   Any decreases in financial assistance may be accompanied by increased case management as the provider deems necessary to retain a participant's housing stability.

2. The maximum amount of rental assistance can be up to 100% of the monthly rental amount, however it is expected that on at least a quarterly basis providers will re-assess a participant's financial ability to pay rent, and make any adjustments needed to support the maintenance of stable housing and appropriate use of funding.

3. The maximum percentage of income paid by participants toward rent at program completion should generally not exceed 50%. There may however, be participants whose rental share may exceed 50% based on their individual circumstances.



   a. Progressive reductions to participant rental assistance will be determined by RRH provider and be accompanied as necessitated by planning for program termination. Please note that during Annual Re-evaluation providers should use the HMIS Annual Update or Project Exit Assessment to comply with the federal standards for calculating income under §24 CFR 5.609.

4. If project funding ends and the agency runs out of rental assistance funds before a participant is ready for termination, on mutual agreement with another Sonoma County RRH provider who has funds, the remaining agency may take on the current case as long as that household's total service time does not exceed the ESG 24-month limit. Should this not be possible, provider will refer the household to local Prevention/Diversion programs.

   HUD states in AAQ #34468 dated July 17, 2014 that if both grantee subrecipients receive ESG

funding from the same recipient (i.e. California HCD), transfer of a participant household may occur to a different RRH provider IF the participant has been properly determined to be eligible for ESG RRH assistance. This transfer would not require a new participant application or trigger re-evaluation. However, the documentation of eligibility rather an intake or re-evaluation must be made available to the new provider and if the first provider had additional, more restrictive eligibility requirements, the new provider must ensure continued compliance with the additional criteria.

The funder must be informed that this type of activity is taking place with its funds, providers should discuss the best ways to ensure accurate project reporting and performance tracking between the two projects and assure data is capture accurately within the HMIS including project exit from the former and entry into the new.

5. Other than the ESG rule stating that the participation period shall not exceed 24 months within three years, local providers have discretion to determine the maximum number of times assistance may be provided.

Area Median Income (AMI) to determine ESG income levels

Providers will conduct annual re-evaluation of participant income against the HUD Area Median Income (AMI) standards. HUD updates the AMI data annually usually in October. Providers should always use the most current income guidelines available which may be found at this link: http://www.huduser.org/portal/datasets/il/il14/index.html. The current AMI chart is also available at http://sonoma-county-cdc-funding.wikispaces.com/file/view/2014+Rent-Income+Limits+Federal_FINAL.pdf.

Fair Market Rents (FMR's)

Fair Market Rent (FMR) is a rate set by the federal government for each U.S. housing market. It is based upon the average cost of rent for a unit plus the utility allowance. The calculation that is used to determine FMR for a specific unit is:

Rent of Unit + Utility Allowance = FMR

In order for a rental to qualify for RRH rental assistance, it cannot exceed the determined FMR amount, which is based on the number of bedrooms in a unit (24 CFR 576.106 (d)). FMR limitations do not apply when RRH is providing any type of financial assistance other than "rental" assistance (i.e. a security deposit, last month's rent, utility deposits and payments, payments in arrears or moving costs). HUD FMR rates are updated annually in October and apply to any new housing units occupied on or after the date of publication. Current FMR data sets for each county may be found here:

http://www.huduser.org/portal/datasets/fmr.html

The utility allowance is an estimate of how much monthly utilities are likely to cost in a particular unit. It is not a maximum "allowance" for how much RRH program participants are allowed to pay for utilities. The utility allowance will be different for every unit and is based on Sonoma County's

average utility costs. Utility allowances for a rental unit will be determined during the inspection.

A worksheet for utility allowances in Sonoma County can be found here:
http://www.sonoma-county.org/cdc/s8utilityallow.htm

Habitability Standards including Lead Based Paint

Minimum standards for ESG permanent housing programs have been set by HUD and the RRH provider may establish additional standards that exceed or add to the federal minimums. Per §576.403(c) minimums are set for:

- Structure and materials
- Space and security
- Interior air quality
- Water supply
- Thermal environment
- Illumination and electricity
- Food preparation
- Sanitary conditions
- Fire safety

Rent reasonableness guidelines mandate that all housing units must be inspected to ensure habitability and no lead based paint prior to participant move-in and provision of financial assistance. Sample Inspection and Lead Screening Checklist are included in the attachments section.

RRH providers should comply with the occupancy standards established by the Housing Authority for their locations--either Sonoma County Housing Authority or the City of Santa Rosa Housing Authority.

HMIS Procedure for RRH Programs

As of October 1, 2014, entry of Rapid Re-Housing data including assessments and services into the local Homeless Management Information System (HMIS) is mandated for the following funding sources under the HMIS 2014 Data Manual guidance:

* California Department of Housing and Community Development – Emergency Solutions Grant – ESG Interim Rule Part 576, December 5, 2011
* Sonoma County Community Development Commission Emergency Solutions Grant – ESG Interim Rule Part 576, December 5, 2011
*Sonoma County Community Development Commission – local Rapid Re-Housing funding administered on behalf of the County of Sonoma (LMIHAF or other County funds)
*Sonoma Works Housing Support Program – administered by County of Sonoma Human Services
*Veterans Administration – All Supportive Services for Veterans Families (SSVF) grants

Sonoma County uses Social Solutions Efforts to Outcomes HMIS template (referred hereto as EtO) to record the ESG required HMIS data.

HMIS Security and Confidentiality

HMIS standards mandate that all client information either being entered into the HMIS or being made use of for program management be held to the highest standard of confidentiality. The address or location of any housing or rental units and personal client data funded under any of the rapid re-housing streams must be kept confidential from disclosure outside the provider's normal need for information consistent with federal, state and local regulation.

Protection for Domestic Violence Victims

The Violence Against Women Act of 1994 includes a provision that prohibits the use of Domestic Violence providers from participating in a CoC-wide HMIS. The HUD Assessment does contain two questions about the participant's domestic violence history. RRH providers should make every effort to record responses to the following HMIS Assessment questions:

A-177 Is the client a victim/survivor of domestic violence?
A-178 When did the client's last episode of domestic violence occur?

Outside of these two required HUD questions, case notes about domestic violence episodes should not be maintained in the HMIS.

Acceptance into RRH Pre-Service Programs (Non-SSVF)

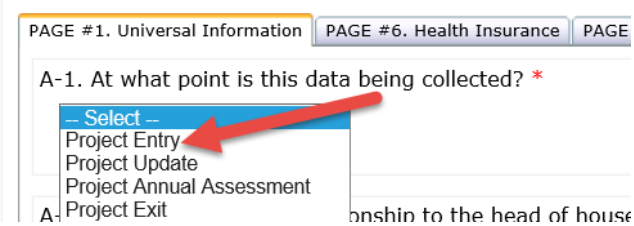
Upon program acceptance (from the Coordinated Intake Referral and Provider evaluation), the RRH provider will enroll the Head Of Household (only) into a "pre-service" RRH project within the HMIS. The goal of pre-service enrollment will be to provide Rapid Re-Housing services aimed to ready the participant for immediate housing stability (without ongoing financial supports) or for movement into an RRH "housed" program where the client will receive ongoing financial and case management supports.

Providers are required by ESG to keep a record of every participant who presents for RRH service regardless of their acceptance into a program. To that end providers are strongly encouraged to enter all initial contacts into the HMIS. A tracking field within the basic ESG services touchpoint allows entry to determine a participant's final enrollment status. Enter the Head of Household and any other participants in the household to whom individual services will provided into one of the designated RRH Pre-Service programs in the HMIS.

1. Perform a Search/Enroll to determine if a participant is already entered into the HMIS. If the participant is not found through the Search/Enroll function, proceed to "Add New Participant/Family."

2. If the participant already exists in the HMIS and was created through the Search Enroll function, provider will check and confirm the participant's Demographics information to assure accuracy of the data for the current program enrollment, and enter or update as needed.

3. Enter a HUD Assessment (Entry/Update/Annual/Exit) by selecting the value Project Entry for Q.A-1.



4. Record each service provided for each participant being served, using the:
    a. Sono – ESG Financial Assistance (for one time payments of financial assistance log to HOH only) or
    b. Sono – ESG Services, Prevention or Rapid Re-Housing

*Note that enrollments into the RRH Pre-Service program should observe the thirty (30) day limitation for housing stability "case management" services prior to the client becoming housed (§ 576.105 (2)). Other services under Housing Relocation and Stabilization are not subject to this limitation. See chart on p. x for a list of eligible activities. *(HMIS users may use an EtO feature to set the "anticipated" program end date during program enrollment)*

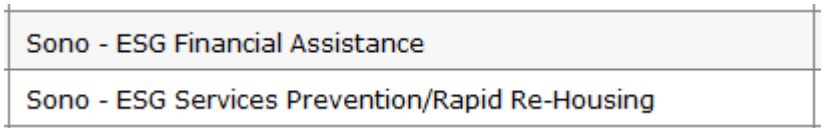
Enrollment into "Housed" RRH HMIS Programs (non-SSVF)

If the household (whether single of family) is accepted into the "housed" program and upon location of suitable housing where they will receive ongoing financial support and case management, the household should be exited on the day they enter housing from the "pre-service" HMIS project, and entered into the "housed" HMIS project component.

1. Complete a Project Exit from the RRH Pre-Service Program using the A-183 response to Exit Destination "Rental by client with other ongoing housing subsidy" and A-185 response Housing Assessment Disposition at Exit "Referred to Rapid Re-Housing" values.

2. Complete a Project Entry into the RRH "housed" HMIS program for each family member being placed into a bed.

3. Record each service provided for each participant receiving a service using these EtO Touchpoint assessments:
    a. Sono – ESG Financial Assistance (for one time payments of financial assistance log to HOH only) or
    b. Sono – ESG Services, Prevention or Rapid Re-Housing



Participants screened and deemed ineligible

The ESG program requires that a record of all clients screened, and classified as ineligible for RRH service, be retained along with the reason for the ineligible determination. While maintaining those

records in the HMIS is optional –RRH providers will utilize the Sono – ESG Services Prevention/Rapid Re-Housing Touchpoint to record a final disposition. Recording of a participant deemed ineligible for service does not eliminate the requirement to follow up with the participant in writing as to their enrollment determination.

Participant Project Exit

If the household will receive ongoing financial support other than a one-time deposit, they should be exited from the Pre-Service program on the day they enter housing, and entered into the "housed" program component in the HMIS. Regardless of the exact exit date, the HMIS information must correspond to the actual project exit date from housing.

Participant Grievances

All providers of RRH programs shall be required to have a written formal termination and grievance policy that is provided to all participants at intake and made available at any time, to enable a participant to dispute an agency decision on eligibility for assistance (or for any other reason). The policy must include the method by which an applicant would be made aware of the grievance procedure, and the formal process for review and resolution.

If a participant household violates program requirements, the provider may terminate assistance in accordance with a formal process established in the RRH Program Standards. The policy will include a written notice providing a clear statement of reason(s) for termination and the participant household must be given the opportunity to present information before someone other than the person (or subordinate of that person) making the termination decision. A final written notice of the termination decision must be delivered to the participant no later two weeks after a determination is made.

The Client Grievance Procedure document and list of low-income legal mediators is attached to these standards.

Conflict of Interest

The provision of any type or amount of ESG assistance may not be conditioned upon an individual or family's acceptance or occupancy of emergency shelter or housing owned by any RRH Provider or its parent organization. Further details can be found at Sec. § 576.404 on p.75987 of the ESG Interim Rule.

Participant Follow Up

Follow up after RRH Program exit at a one-year anniversary is encouraged (dependent upon currently available resources). A custom HMIS follow-up assessment which includes a tickler capability may be used at the discretion of the RRH provider to record the date and method of attempted contact, who spoke to the household (if that occurs) and their current housing status.

Program Monitoring and Evaluation

Program monitoring will be performed by the project funder as that entity determines the need. Program evaluation will be ongoing by the Rapid Re-Housing Workgroup and the Continuum of Care Evaluation Committee, which will take into consideration the requirements as stated by the State of California Housing and Community Development as informed by the requirements of its annual application process. It will also take into consideration progress against local data benchmarks as defined by the workgroup and the Continuum of Care Evaluation Committee and Board.

RRH program evaluation and review by the CoC Rapid Re-Housing Standards Group will occur at least semi-annually.

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Glossary of Key Rapid Re-Housing Project Terms

CalWORKS – A welfare program operated by California county welfare departments that provides cash aid and services to eligible needy families.

Continuum of Care (CoC) – The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments.

Coordinated Intake (CI) – A process designed to coordinate program participant intakes and referrals. A centralized, or coordinated, system creates a singular process for accessing homeless services.

Emergency Solutions Grant (ESG) – Emergency Solutions Grant is a federal funding source designed to assist homeless persons through five activity types including Street Outreach, Emergency Shelter, Homeless Prevention, Rapid Re-housing, and HMIS. Funding is provided via Entitlement City or State Governments.

EtO – Social Solutions Group Efforts to Outcomes HMIS system used by Sonoma County Continuum of Care

HCD – State of California Department of Housing and Community Development – the entity who administers federal ESG funding passed through to the state

Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act – Amended and reauthorized the earlier McKinney-Vento Homeless Assistance Act with substantial changes in 2009. It consolidated HUD's Continuum of Care grant programs and changed HUD's definition of homelessness and chronic homelessness.

Housing First - A model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements. Rapid housing placement and stabilization in "permanent" settings is the primary goal for the participant household.

Household (HH) – any group of persons presenting for services together (as a household or family).

Head of Household (HoH) –a term used in the HMIS data standards for consistency with other regulatory guidance and it does not necessarily indicate the individual's status in the household. The term "primary client" may be substituted for Head of Household. If the household is composed of two or more unaccompanied youth, one minor must be designated as the head of the household.

Households with only Adults – when a group of persons apply together for services at least one person must be deemed the Head of Household. Any group of persons applying for service together shall be considered a household. As a general rule, one adult should not provide the HMIS information for any other adult in the household.

Households with Children – a Household composed of at least one adult and one child under the age of 18. The Children are not required to be present at the time the household applies for service, however, information should not be recorded for children under age 18 if it is indicated children will not be entering the project on the same day as the head of household. Information for these children should be recorded when children join the project. A project should edit the project entry record as part of the household and other adults.

- Custody: Where partial custody of the child creates a question as to whether to include the child in the household, the adopted Occupancy Standards will guide the determination. If this is inadequate, the provider may make this decision.
- Foster care: If a child is in foster care for fewer than 180 days, the child must be counted as part of the household. If the child is permanently removed, the HH size may be reduced for purposes of occupancy.

Pregnant Women – a pregnant women is considered to be a "Self Head of Household" at project entry until the child is born at which time the household record is changed via EtO Edit Families function. At this time, a full assessment process must be conducted for the child and entered into the HMIS.

HUD – The federal Department of Housing and Urban Development which provides ESG funding

LMIHAF –Sonoma County's Low- and Moderate-Income Housing Asset Fund (assets from County of Sonoma, Cities of Sonoma and Sebastopol Redevelopment Successor Agencies), of which up to $250,000 annually may be used for Rapid Re-Housing.

Rapid Re-housing (RRH) - Program that provides financial assistance and services to prevent individuals and families from becoming homeless and help those who are experiencing homelessness to be quickly re-housed and stabilized.

URA – The Uniform Act (or "Uniform Relocation Act"), passed by Congress in 1970, is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects.

Veterans Affairs Supportive Housing (VASH) - Program combines Housing Choice Voucher (HCV) rental assistance for homeless Veterans with case management and clinical services provided by the Department of Veterans Affairs (VA). VA provides these services for participating Veterans at VA medical centers (VAMCs) and community-based outreach clinics.

Homeless Definition

CRITERIA FOR DEFINING HOMELESS	**Category 1**	Literally Homeless	(1) 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); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	(4) Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing

Determination of Chronic Homeless Status

Overview: With the recent 2014 HMIS Data Standards update taking effect Wednesday you are being requested to use this form to determine a client's chronically homeless status.

Definition: Per federal regulation 24 CFR 578.3 an individual or family member meets the Chronically Homeless Definition when: consistent with the RHSP Interim rule, the chronically homeless persons includes individuals and families who have a

a. *qualifying disabling condition and*

b. *have been homeless and living in a place not meant for human habitation, emergency shelter, or safe haven for 1 year continuously or over a period of four occasions in the past 3 years. It is important to point out that persons in transitional housing are not considered to be chronically homeless even if they met the criteria prior to entering the transitional housing program.*

Qualifying Disabilities: A qualifying disability for the purpose of determining chronically homeless status includes:

- A diagnosable substance abuse disorder
- A serious mental illness
- A developmental disability
- A chronic physical illness or disability, including the co-occurrence of two or more of these conditions

Verification of a disability can include:

1. Letter from a medical professional attesting to the presence of the condition.
2. Verified through receipt of Supplemental Security Disability Income (SSDI) if the SA obtains written verification from the Social Security Administration that the disability is one of the targeted populations within the grant

Verification of homelessness can include:

1. Certification letter from an emergency shelter
2. Certification letter from a homeless service provider or outreach worker
3. Certification letter from any other health or human service provider
4. Certification Self-Statement signed by the client

Staff Name: _____ Staff Title: _____

Organization: _____

Participant Signature: _____

Date: _____

Client Release of Information Form

Overview: The Sonoma County Homeless Coordinated Intake Program provides a single access point to over 140 shelter and housing programs throughout the county, which reduces the work families and individuals must do to locate housing or shelter and move out of homelessness.

Use of Confidential Information: The purpose of this Release of Confidential Information consent form is to allow the Sonoma County Continuum of Care Coordinated Intake (CI) Program to use information you provide to assist in procuring housing/shelter placement and provide support services for you and your family. In order to enroll you and your family in the CI Program, we need to collect some personal information from you as the head of your household. When housing resources become available you will be notified about the referral(s) being made.

While you are enrolled in the CI Program, Coordinated Intake staff will have access to your confidential information. In addition, should you and your family be referred to a Sonoma County homeless service agency/program for housing placement, that agency will be afforded the information you have provided.

Unless you stipulate otherwise, your confidential information will only be forwarded to Homeless Management Information System (HMIS) Participating Provider. The HMIS is a HIPAA compliant online database. All staff and administrators with access to the HMIS observe rigorous client security and ethical standards as mandated by the federal Department of Housing and Urban Development (HUD) and the Sonoma County Continuum of Care HMIS Quality Assurance workgroup. HMIS users are re-certified in Client Security and Ethics on an annual basis.

Your information will not be provided to any other party unless specifically outlined and agreed to in an addendum to this form, except for situations where a threat exists of harm to yourself or other persons.

*(**Note** If you ever have reason to believe your confidential information in the Sonoma County HMIS has been misused, you should immediately contact the Sonoma County Continuum of Care HMIS Coordinator by emailing hmis@sonoma-county.org or calling the Community Development Commission at (707) 565-7500)*

Disclosures and Period of Enforcement: The release I am signing will be in effect for a period of two years from the date of signed authorization by you. Should you refuse to sign this consent, you and your family may not be refused service, however by allowing the homeless providers you work with access to this information, a more relevant case plan will be able to be created to assist you.

Specifically the information you provide will be considered active until one of the following events occur:

1. The Release of Confidential Information lapses after a period of two years
2. You return to the Coordinated Intake Program with a new request to obtain shelter/housing services
3. You (at any time) formally request this Confidential Release of Information be revoked

Provisions of this Release of Information: By providing my consent I am allowing Coordinated Intake Program staff to provide case management and housing placement services and share my information with Sonoma County HMIS Participating Providers where I and my family have been referred for service.

I, _____, (full name) and/or

_____ (alias) on this day of _____

as head of my household, authorize the Sonoma County Homeless Coordinated Intake Program to collect and share the following information with HMIS Participating homeless service providers to whom I have been referred for housing, shelter or other homeless service:

- Client Demographics including full name, DOB, SSN, Race, Ethnicity (see attached)
- Confidential information gathered during the Sonoma County VI-SPDAT for Families assessment process (including health and personal finance information – see attached)
- The shelter and/or housing program(s) preference my family has expressed interest in
- The date my family was placed on the Coordinated Intake Family Wait List for shelter and/or housing

The list of Sonoma County Homeless Service Providers who may have access to your information (upon acceptance into their program) is below. I understand additional agencies may join the Coordinated Intake system at any time and upon my request I will be provided a current list of those partner agencies.

Agency Name	Acronym
Buckelew Programs	BUCK
Catholic Charities of the Diocese of Santa Rosa	CC
Cloverdale Community Outreach	CCOC
Committee on the Shelterless	COTS
Community Action Partnership	CAPS
Community and Family Service Agency	CFSA
Community Support Network	CSN
County of Sonoma Human Services	HSD
Drug Abuse Alternatives Center	DAAC
Face to Face	F2F
Interfaith Shelter Network	IFSN

Legal Aid Sonoma County	LASC
Petaluma People Services	PPSC
Redwood Gospel Mission	RGM
Santa Rosa Health Centers	SRHC
Sonoma County Housing Authority	SCHA
Social Advocates for Youth	SAY
Sonoma Overnight Support	SOS
The Living Room	TLR
Veteran's Resource Centers of America	VRCOA
Volunteer Center of Sonoma County 211	211

SIGN BELOW IF AGREEING TO BE ENROLLED AND ASSESSED

Your signature (or mark) indicates that you have read (or been read) the information provided above, have had all your questions satisfactorily answered and agree to provide information for the purpose of enrolling in the Sonoma County Homeless Coordinated Intake Program.

I certify that this request has been made freely, voluntarily and without coercion and that the information given above is accurate to the best of my knowledge. I understand that I may revoke this authorization at any time except to the extent that action has already been taken to comply with it. Unless revoked in writing, this release of information is valid for a period of two years from the date of Coordinated Intake program enrollment.

_____ _____

SIGNATURE OF HEAD OF HOUSEHOLD DATE

TO BE COMPLETED BY THE Sonoma County Homeless Coordinated Intake Program

Please write clearly to ensure accuracy

Head of Household's Name/Alias: _____

Date enrolled in the Coordinated Intake Program: _____

The program(s) your family expressed interested in being referred to:

Acceptable Forms of Personal Identification for Housing Programs

- Valid driver's license or identification card issued by DMV
- Valid driver's license or identification card from the state or country of origin
- Birth Certificate
- United States Passport
- Foreign passport
- Verification of citizenship, alienage, or immigration status
    - Permanent Resident Card or Alien Registration Receipt Card
    - Employment Authorization Document (Card) that contains a photograph
    - Green Card
    - Work Visa
- Certificate of Naturalization or Citizenship
- American Indian Card
- Voter's registration card
- US military card
- Military dependent's ID card
- Social Security Card or Tax ID number
- State Benefits Card

Efforts to Outcomes HMIS Required RRH Forms

- Participant Demographics
- Participant Project Entry (Adult)
- Participant Project Entry (Child)
- Participant Mid-Term Annual Assessment
- Sono – ESG Financial Assistance
- Sono – ESG Services Prevention/Rapid Re-Housing
- Sono – Service Follow Up
- WEBi Reports – RRH evaluation reports to be listed on this page

Obtain all forms and currently updated information at the HMIS Wiki page:
http://sonoma-county-hmis.wikispaces.com/Nav_HMIS+Forms

Note – you must be an HMIS Wiki Member to access the wiki pages

Sample Participant Grievance Procedure

Overview: It is a program participant's right, as well as program policy to be informed of and utilize a formal grievance procedure to resolve disputes or difficulties that arise between the agency's residents and staff. The following is our grievance procedure:

Step 1: Complete the attached Grievance Form (provided you during initial program intake). The form will ask you to describe the problem you are having and with whom. It is very important to include as many details as possible. If you need assistance completing the form, please let _____ know.

Step 2: You have a chance for an in-person meeting with the staff person with whom you are having the problem in order to explain your grievance and express your feelings. Be sure to ask the staff person for further consideration of your side of the issue and try to resolve your grievance at that meeting.

Step 3: If the discussion with the staff person does not resolve the grievance, let the staff person know you will be scheduling a meeting with their supervisor to work toward resolution.

Step 4: The staff member will setup the appointment with their supervisor for you and notify you of the date and time. When you meet with the staff supervisor be sure to bring your completed Grievance Form along with you for the meeting.

Step 5: If the discussion with the staff person's supervisor has not resolved the problem, let the supervisor know that you are requesting a meeting with the next higher authority who is _____. Please be aware the _____ may have the Program Manager and other agency staff present at this meeting.

Step 6: If the discussion with _____ does not resolve your dispute, inform them you will be writing a letter of grievance to the Executive Director of the agency and requesting a meeting to resolve the dispute. Write a letter and include a copy of the grievance form and mail to:

Name
Title
Address

Please note: The agency Board of Directors will not be involved in the grievance process unless the grievance directly involves the Executive Director, or unless the Executive Director recommends the Board hear a particular grievance because it is necessary they make a final determination on the issue.

Participant Program Termination Policy

Overview: Participants who are enrolled into any housing program of the Sonoma County Continuum of Care need to read and understanding a program termination policy. Program termination occurs for both a successful end to program services and early termination from services for cause:

A. Program Exit - Participants who successfully complete the program will be terminated when their rent subsidy times out, or if, at their annual re-evaluation, their income exceeds the current federal guidelines.

B. Termination for Cause – Participants who are evicted by their landlords, or who do not adhere to the rules, regulations and requirements of the program, or the requirements agreed to in their Individual Housing Plan(s) may be terminated from the program for cause.

C. Participants are informed of the program's expectations, rules and requirements at the time of program intake and receive a copy of the Termination Policy and Grievance Procedure at intake.

D. Termination Process:
   a. Successful program termination will consist of providing the participant(s) with a 30-day notice acknowledging successful completion of the program.

   b. Termination for Cause will consist of providing the client(s) with a written notice of Program non-compliance that will provide details and consequences specific to the area of non-compliance. All notices will be hand-delivered and if not directly received by the participant, will be posted and send via certified mail.

   c. Any participant who is terminated for cause may appeal their termination using the CoC grievance procedure outlined in the documents provided to them at enrollment by the Case Manager/Intake Coordinator. *The grievance document will be reviewed by a person other than the person (or that person's subordinate) who made or approved the termination decision. Program participants shall receive prompt written notice of the final decision.*

ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing

About this Tool

The Emergency Solutions Grants (ESG) Program Interim Rule establishes different habitability standards for emergency shelters and for permanent housing (the Rapid Re-housing and Homelessness Prevention components).

- **Emergency Shelter Standards**.
  - Emergency shelters that receive ESG funds for renovation or shelter operations must meet the minimum standards for safety, sanitation, and privacy provided in §576.403(b).
  - In addition, emergency shelters that receive ESG funds for renovation (conversion, major rehabilitation, or other renovation) also must meet state or local government safety and sanitation standards, as applicable.
- **Permanent Housing Standards.** The recipient or subrecipient cannot use ESG funds to help a program participant remain in or move into housing that does not meet the minimum habitability standards under §576.403(c). This restriction applies to all activities under the Homelessness Prevention and Rapid Re-housing components.

Recipients and subrecipients must document compliance with the applicable standards. Note that these checklists do not cover the requirements to comply with the Lead-Based Paint requirements at §576.403(a). For more discussion about how and when the standards apply, see ***ESG Minimum Standards for Emergency Shelters and Permanent Housing,*** located at http://OneCPD.info/esg.

The checklists below offer an optional format for documenting compliance with the appropriate standards. These are intended to:

1. Provide a clear summary of the requirements and an adaptable tool so recipients and subrecipients can formally assess their compliance with HUD requirements, identify and carry out corrective actions, and better prepare for monitoring visits by HUD staff.
2. Provide a tool for a recipient to monitor that its subrecipient is in compliance with HUD requirements. Where non-compliance is identified, the ESG recipient can use this information to require or assist the subrecipient to make necessary changes.

Prior to beginning the review, the subrecipient should organize relevant files and documents to help facilitate their review. For instance, this may include local or state inspection reports (fire-safety, food preparation, building/occupancy, etc.), or policy and procedure documents related to emergency shelter facility maintenance or renovations.

Carefully read each statement and indicate the shelter's or unit's status for each requirement (Approved or Deficient). Add any comments and corrective actions needed in the appropriate box. The reviewer should complete the information about the project, and sign and date the form. This template includes space for an "approving official," if the recipient or subrecipient has designated another authority to approve the review. When the assessment is complete, review it with program staff and develop an action plan for addressing any areas requiring corrective action.

Minimum Standards for Permanent Housing

Instructions: Place a check mark in the correct column to indicate whether the property is approved or deficient with respect to each standard. The property must meet all standards in order to be approved. A copy of this checklist should be placed in the client file.

Approved	Deficient	**Standard** *(24 CFR part 576.403(c))*
		1. *Structure and materials*: The structure is structurally sound to protect the residents from the elements and not pose any threat to the health and safety of the residents.
		2. *Space and security*: Each resident is provided adequate space and security for themselves and their belongings. Each resident is provided an acceptable place to sleep.
		3. *Interior air quality*: Each room or space has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents.
		4. *Water Supply*: The water supply is free from contamination.
		5. *Sanitary Facilities*: Residents have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
		6. *Thermal environment*: The housing has any necessary heating/cooling facilities in proper operating condition.
		7. *Illumination and electricity*: The structure has adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There are sufficient electrical sources to permit the safe use of electrical appliances in the structure.
		8. *Food preparation*: All food preparation areas contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
		9. *Sanitary condition*: The housing is maintained in sanitary condition.
		10. *Fire safety*: a. There is a second means of exiting the building in the event of fire or other emergency. b. The unit includes at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors are located, to the extent practicable, in a hallway adjacent to a bedroom. c. If the unit is occupied by hearing-impaired persons, smoke detectors have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. d. The public areas are 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.
		11. Meets additional recipient/subrecipient standards (if any).

CERTIFICATION STATEMENT

I certify that I have evaluated the property located at the address below to the best of my ability and find the following:

☐ Property meets all of the above standards.

☐ Property does not meet all of the above standards.

COMMENTS:

ESG Recipient Name: _____

ESG Subrecipient Name: _____

Program Participant Name: _____

Street Address: _____

Apartment: _____

City: _____ State: _____ Zip: _____

Evaluator Signature: _____ Date of review: _____

Evaluator Name: _____

Approving Official Signature (if applicable): _____ Date: _____

Approving Official Name (if applicable): _____

ESG Lead Screening Worksheet

About this Tool

The *ESG Lead Screening Worksheet* is intended to guide grantees through the lead-based paint inspection process to ensure compliance with the rule. ESG staff can use this worksheet to document any exemptions that may apply, whether any potential hazards have been identified, and if safe work practices and clearance are required and used. A copy of the completed worksheet along with any additional documentation should be kept in each program participant's case file.

INSTRUCTIONS

To prevent lead-poisoning in young children, ESG grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. Under certain circumstances, a visual assessment of the unit is not required. This screening worksheet will help program staff determine whether a unit is subject to a visual assessment, and if so, how to proceed. A copy of the completed worksheet along with any related documentation should be kept in each grantee or program participant's file.

Note: ALL pre-1978 properties are subject to the disclosure requirements outlined in 24 CFR 35, Part A, regardless of whether they are exempt from the visual assessment requirements.

BASIC INFORMATION

Name of Participant

Address Unit Number

City State Zip

ESG Program Staff

PART 1: DETERMINE WHETHER THE UNIT IS SUBJECT TO A VISUAL ASSESSMENT

If the answer to one or both of the following questions is 'no,' a visual assessment is <u>not</u> triggered for this unit and no further action is required at this time. Place this screening worksheet and related documentation in the program participant's file.

If the answer to both of these questions is 'yes,' then a visual assessment is triggered for this unit and program staff should continue to Part 2.

1. Was the leased property constructed before 1978?

   ☐ Yes

   ☐ No

2. Will a child under the age of six be living in the unit occupied by the household receiving ESG assistance?

   ☐ Yes

   ☐ No

PART 2: DOCUMENT ADDITIONAL EXEMPTIONS

If the answer to any of the following questions is 'yes,' the property is exempt from the visual assessment requirement and no further action is needed at this point. Place this screening sheet and supporting documentation for each exemption in the program participant's file.

If the answer to all of these questions is 'no,' then continue to Part 3 to determine whether deteriorated paint is present.

1. Is it a zero-bedroom or SRO-sized unit?

   ☐ Yes

   ☐ No

2. Has X-ray or laboratory testing of all painted surfaces by certified personnel been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint?

   ☐ Yes

   ☐ No

3. Has this property had all lead-based paint identified and removed in accordance with HUD regulations?

   ☐ Yes

   ☐ No

4. Is the client receiving Federal assistance from another program, where the unit has already undergone (and passed) a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears)?

   ☐ Yes (Obtain documentation for the case file.)

   ☐ No

5. Does the property meet any of the other exemptions described in 24 CFR Part 35.115(a).

   ☐ Yes

   ☐ No

   Please describe the exemption and provide appropriate documentation of the exemption.

PART 3: DETERMINE THE PRESENCE OF DETERIORATED PAINT

To determine whether there are any identified problems with paint surfaces, program staff should conduct a visual assessment prior to providing HPRP financial assistance to the unit as outlined in the following training on HUD's website at: http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm.

If no problems with paint surfaces are identified during the visual assessment, then no further action is required at this time. Place this screening sheet and certification form (Attachment A) in the program participant's file.

If any problems with paint surfaces are identified during the visual assessment, then continue to Part 4 to determine whether safe work practices and clearance are required.

1. Has a visual assessment of the unit been conducted?

   ☐ Yes

   ☐ No

2. Were any problems with paint surfaces identified in the unit during the visual assessment?

   ☐ Yes

   ☐ No (Complete Attachment A – Lead-Based Paint Visual Assessment Certification Form)

PART 4: DOCUMENT THE LEVEL OF IDENTIFIED PROBLEMS

All deteriorated paint identified during the visual assessment must be repaired prior to clearing the unit for assistance. However, if the area of paint to be stabilized exceeds the de minimus levels (defined below), the use of lead safe work practices and clearance is required.

If deteriorating paint exists but the area of paint to be stabilized does not exceed these levels, then the paint must be repaired prior to clearing the unit for assistance, but safe work practices and clearance are not required.

1. Does the area of paint to be stabilized exceed any of the de minimus levels below?

   - 20 square feet on exterior surfaces ☐ Yes ☐ No
   - 2 square feet in any one interior room or space ☐ Yes ☐ No
   - 10 percent of the total surface area on an interior or exterior component with a small surface area, like window sills, baseboards, and trim ☐ Yes ☐ No

If *any* of the above are 'yes,' then safe work practices and clearance are required prior to clearing the unit for assistance.

PART 5: CONFIRM ALL IDENTIFIED DETERIORATED PAINT HAS BEEN STABILIZED

Program staff should work with property owners/managers to ensure that all deteriorated paint identified during the visual assessment has been stabilized. If the area of paint to be stabilized does not exceed the de minimus level, safe work practices and a clearance exam are not required (though safe work practices are always recommended). In these cases, the ESG program staff should confirm that the identified deteriorated paint has been repaired by conducting a follow-up assessment.

If the area of paint to be stabilized exceeds the de minimus level, program staff should ensure that the clearance inspection is conducted by an independent certified lead professional. A certified lead professional may go by various titles, including a certified paint inspector, risk assessor, or sampling/clearance technician. Note, the clearance inspection cannot be conducted by the same firm that is repairing the deteriorated paint.

1. Has a follow-up visual assessment of the unit been conducted?

   ☐ Yes

   ☐ No

2. Have all identified problems with the paint surfaces been repaired?

   ☐ Yes

   ☐ No

3. Were all identified problems with paint surfaces repaired using safe work practices?
   - ☐ Yes
   - ☐ No
   - ☐ Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.
4. Was a clearance exam conducted by an independent, certified lead professional?
   - ☐ Yes
   - ☐ No
   - ☐ Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.
5. Did the unit pass the clearance exam?
   - ☐ Yes
   - ☐ No
   - ☐ Not Applicable – The area of paint to be stabilized did not exceed the de minimus levels.

   Note: A copy of the clearance report should be placed in the program participant's file.

ATTACHMENT 1: LEAD-BASED PAINT VISUAL ASSESSMENT CERTIFICATION TEMPLATE

I, _____, certify the following:
(Print name)

- I have completed HUD's online visual assessment training and am a HUD-certified visual assessor.
- I conducted a visual assessment at _____ on
  (Property address and unit number)
  _____.
  (Date of Assessment)
- No problems with paint surfaces were identified in the unit or in the building's common areas.

_____
(Signature)

_____
(Date)

Sonoma County Mediation Providers - Specializing in Landlord/Tenant Issues

Legal Aid of Sonoma County – (707) 542-1290
http://legalaidsc.org/
Service focus on homelessness prevention for low-income persons due to unlawful evictions

Recourse Mediation – (707) 525-8545
http://www.recoursemediation.com/
Service focus on conflict resolution between landlords and tenants over outstanding rental payments, security deposits disputes, property damage and eviction

Links to other ESG Regulatory Sources

- ESG Interim Rule – Part 576 published December 5, 2011
https://www.hudexchange.info/resource/1927/hearth-esg-program-and-consolidated-plan-conforming-amendments/

- ESG Frequently Asked Questions
https://www.hudexchange.info/faqs/programs/emergency-solutions-grants-esg-program/

- ESG SNAPS-Shots
https://www.hudexchange.info/resource/2893/snaps-shots/

- ESG Record Keeping Requirements for Homeless Status
https://www.hudexchange.info/resource/2016/homeless-status-recordkeeping-requirements-webinar/

- ESG Minimum Habitability Standards
https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/