

VERMONT HOP STANDARDS OF PROVISION OF ASSISTANCE
State Fiscal Year 2023

Emergency Shelter

A. *Emergency Shelter providers must have written policies or procedures addressing shelter admission that meet the following requirements:*

- Program participant eligibility is limited to families and individuals who meet the criteria under paragraph (1), (2), (3), or (4) of the HUD Definitions of Homelessness in 24 CFR 576.2
 - Eligibility is documented following the requirements outlined in 24 CFR 576.500(b), (c), (d), and (e).
- The following may not be used as the basis for denying someone admission to shelter:
 - Age of children in the family (for shelters that provide services to families)
 - Fleeing domestic or sexual violence
 - Disability status, including substance use disorder or mental health disorder
 - Any other protected class, except in the case that the shelter is limited to specific subpopulations (e.g. youth, adults only, families with children)
- Hours of admission must be posted clearly for the general public and include information about where/how to apply
- Include a process for reasonable accommodation requests and information about how there are reviewed
- Planning for discharge starts at the time of admission to ensure that guests are moving to permanent housing as soon as possible

B. *Emergency Shelter providers must have a written standard to ensure diversion from shelter occurs when possible.* Diversion occurs before a person enters shelter and is aimed at helping them identify an immediate housing arrangement that is a safe alternative to shelter or sleeping unsheltered. This housing arrangement may be temporary, allowing time to identify a permanent housing option while avoiding the immediate trauma of homelessness, or it may allow those involved to explore the possibility of extending a temporary arrangement into a permanent one.¹ The Emergency Shelter's written standard must include:

- A practice of discussing diversion options with all applicants for shelter at the point of referral or first contact

¹ USICH, "[Homelessness Prevention, Diversion, and Rapid Exit](#)"

- How staff will support the applicant to move towards stability while they are staying in an alternative location to shelter

C. *Emergency Shelter providers must have a written standard that describes how the shelter coordinates access to mainstream benefits and resources (such as housing, health, social services, employment, education, and youth programs) to ensure guests are assisted, as needed, with obtaining appropriate supportive services, including other Federal, State, local, and private assistance.*

- A policy, procedure, or tool that ensures guests are screened for their needs and then receive appropriate referrals to other providers is acceptable.

D. *Emergency Shelter providers must have written policies and procedures addressing discharge from shelter that meet the following requirements:*

- A formal process for both voluntary and involuntary termination of shelter that at a minimum:
 - Recognizes the rights of individuals affected
 - Clearly defines what could result in the termination of shelter, focusing on behaviors that disrupt or jeopardize health or safety of shelter guests, rather than compliance to rules or case plans
 - Exercises judgment and examines all extenuating circumstances in determining when violations warrant termination so that a participant's assistance is terminated only in the most severe cases
- Information about the discharge process is provided to all guests at intake
- When involuntary termination occurs and contact with the guest can be made:
 - The shelter must attempt to work with the guest to identify alternative shelter options
 - Guests are provided with a written notice that includes:
 - the reason for termination
 - the process to appeal the decision
 - what actions they will need to take in order to be considered for a return to shelter in the future, if needed
- The appeals process must:
 - Happen in a timely manner
 - Include the option for guests to have their request reviewed by agency staff not involved in the initial termination decision

- Terminations, both voluntary and involuntary, are documented in a way that allows for them to be reviewed during monitoring²

E. *Emergency Shelter providers may have a length of stay policy. That policy must meet the following requirements:*

- Identifies what the initial length of stay is, how guests can request an extension, and how the program will make decisions about granting the extension
- Information about this policy and the process to request an extension is provided to all guests at intake

F. *Emergency Shelter providers must have written policies and procedures regarding safeguards to meet the safety of special populations, including victims of domestic violence/sexual assault.* The policies and procedures must ensure the following requirements are met:

- No individual or family may be denied admission to or removed from the shelter on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy.
- There must be a process to assess for the potential of threats to safety for persons fleeing domestic violence, dating violence, sexual assault, or stalking.
- The shelter exhibits cultural competence and responsiveness, including providing adequate protections for shelter seekers across demographic differences.
- Confidentiality policies ensure that the identity of guests is protected, except in those circumstances when a guest has signed a release of information or as required by law.

G. *Emergency Shelter providers must have a written standard regarding how they will meet the needs of special populations, including individuals and families who have the highest barriers to housing and are likely to be homeless the longest.* The standard must ensure the following requirements are met:

- Expectations of shelter guests are clearly communicated and easily accessible for review by guests
- Shelter staff and volunteers receive training in trauma-informed care

² Agencies will be asked to report on involuntary terminations as part of their quarterly performance measure report to OEO.

H. *Emergency Shelter providers must provide shelter on a 24/7 basis, unless an exception is granted by the Office of Economic Opportunity.*

- Examples of when exceptions may be granted include, but are not limited to:
 - a shelter is unable to provide staffing on a 24/7 basis
 - zoning requirements prohibit daytime operations
 - the shelter is located in a shared use facility
- Shelters that have been granted an exception are required to identify a daytime continuity plan to ensure guests have access to shelter at all times.
 - When the Emergency Shelter is not open to guests, alternative locations must be identified. These locations:
 - Must not require an appointment
 - Must be considered a public space
 - Must be accessible to all guests

I. *Emergency Shelter providers that maintain a waiting list must have a written policy on prioritization that meet the following requirements:*

- When space in shelter becomes available, the order of priority must, at a minimum, be:
 1. Literally Homeless (Category 1) - Unsheltered
 2. Literally Homeless (Category 1) – Staying in a motel not paid for by self, including those fleeing domestic or sexual violence
 3. Literally Homeless (Category 1) – Staying in a place other than a motel, including those fleeing domestic or sexual violence
 4. Imminently Homeless (Category 2) – Including those fleeing domestic or sexual violence
- Align with fair housing and reasonable accommodation requirements

J. *Emergency Shelter providers must be a part of their local CoC's written protocol for coordination between local emergency shelters, Economic Services, and 2-1-1.* The protocol must meet the following requirements:

- Describe a strategic, community-wide system to prevent and end homelessness for that area
- Identify how shelter openings will be communicated and how referrals to shelter will be coordinated
- Include the following for each agency/partner:
 - Contact information
 - Intake hours

- Shelter hours (if applicable)
- Population(s) served
- Intake process
- Emphasize ease of access for those seeking emergency shelter

K. *Emergency Shelter providers must have written policies or procedures ensuring guest access to the Coordinated Entry system that meet the following requirements:*

- *If the emergency shelter provider is a Referral Partner (VCEH) or Access Point (CCHA), a referral to the local Lead Agency must be made within 3 calendar days of a guest's entry to shelter.*
- *If the emergency shelter provider is a Lead Agency, Assessment Partner (VCEH) or Assessment Hub (CCHA), the opportunity to complete the CE Assessment is provided to the guest within one week of entry into shelter.*

L. *If Emergency Shelter providers require guests to contribute to a savings account while at the shelter, they must have a written policy detailing the requirement.*

M. *Emergency Shelter providers receiving funding for Essential Services must have written standards regarding how guests' needs for services are determined and prioritized.*

- The standards must clearly identify how the needs of guests are assessed during the intake process and on an ongoing basis, as appropriate.
- Needs must be prioritized to ensure that basic/immediate needs are addressed as soon as possible. This may be done through the use of a specific assessment tool, a case plan addressing prioritization, or a written intake process.

Rapid Re-Housing

Written standards may be developed in partnership with the local interagency or housing review team. Written standards must be applied consistently within the program and must conform to the Coordinated Entry policies and procedures established by the respective Continuum of Care.

Grantees may modify their level of assistance below the maximums provided in this document based on availability of HOP funds, or ability to leverage other state, federal or private assistance funding for clients.

No grantee may, with respect to individuals or families occupying housing owned by the grantee or parent organization, determine eligibility, carryout assessment activities, or

administer rental assistance.

A. *Rapid Rehousing providers must have written standards addressing how they will determine and prioritize which eligible families and individuals will receive rapid rehousing assistance.*

- Program participant eligibility is limited to families and individuals who:
 - Meet the criteria under paragraph (1) of HUD's Definition of Homelessness in 24 CFR 576.2; or
 - Meet the criteria under paragraph (4) of HUD's Definition of Homelessness in 24 CFR 576.2 AND are living in an emergency shelter or other place described in paragraph (1)
- Eligibility is documented following the requirements outlined in 24 CFR 576.500(b), (c), (d), and (e).
- Rapid Rehousing services and assistance must be prioritized according to the Coordinated Entry policies and procedures of the Vermont Coalition to End Homelessness or Chittenden County Homeless Alliance (respective to geography).
- Household income information at the time of assistance must be documented and maintained.

B. *Rapid Rehousing providers must have written standards addressing how they will determine how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.*

- While the ability to sustain housing is a HOP program goal and performance measure, it will not be interpreted as a threshold requirement. Prioritization and determination of assistance should be based on household need at the time of initial intake and screening.
- Rental assistance will be tenant-based and provided on a medium-term basis for no less than four months and up to twenty-four months.
- Eligibility and types/amounts of assistance must be re-evaluated not less than once annually. Each re-evaluation must establish and document:
 - 1) that the participant does not have an annual income that exceeds 30% of median family income; and
 - 2) the participant lacks sufficient resources and support networks necessary to retain housing without HOP assistance

- C. Rapid Rehousing providers must have written standards addressing how they will determine what percentage, or amount, of rent and utilities costs each program participant must pay, if any, while receiving rapid re-housing assistance.**
- Grantees are strongly encouraged to require participants to contribute a minimum of 30% of their household income towards housing costs.
- D. Rapid Rehousing providers must have written standards addressing how they will determine the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant.** Standards must include the limits, if any, on the rapid rehousing assistance that each program participant may receive, such as:
- the maximum dollar amount of assistance that can be received;
 - the maximum number of months the assistance can be received for; or
 - the maximum number of times the program participant may receive assistance.
- E. Rapid Rehousing providers must have a written standard that describes how the program coordinates access to mainstream benefits and resources (such as housing, health, social services, employment, education, and youth programs) to ensure participants are assisted, as needed, with obtaining appropriate supportive services, including other Federal, State, local, and private assistance.**
- A policy, procedure, or tool that ensures participants are screened for their needs and then receive appropriate referrals to other providers is acceptable.
- F. Rapid Rehousing providers must provide Housing Retention Services that meet the following requirements³:**
- Require the program participant to meet with a case manager not less than once per month to assist in ensuring long-term housing stability
 - Include the development of a plan to assist the participant in retaining permanent housing after HOP assistance ends, taking into account the participant's current and expected household budget, additional sources of assistance, and affordability of area housing.
- G. Rapid Rehousing rental assistance must meet the following requirements:**
- A written lease must be in place, and the applicant's name must be on the lease, before rental assistance payments are made.

³ Programs are exempt from this case management requirement if prohibited under the federal Violence Against Women Act (VAWA) or Family Violence Prevention and Services Act from making shelter or housing conditional on the participant's acceptance of services.

- Rental assistance cannot be provided if rent exceeds the Fair Market Rent established by HUD or does not meet the standard for rent reasonableness (24 CFR 982.507).
- All payments must be third-party vendor payments; payments may not be made to relatives who are landlords.
- Payments are to be made on behalf of renters only; homeowners are not eligible for HOP assistance.
- No financial assistance may be provided to a household for a purpose and time period supported by another public source.
- The grantee will enter into a rental assistance agreement with the landlord. Landlords must agree to copy the provider on any eviction notice or complaint used to commence eviction; the provider must make timely payments to the owner according to the participant lease agreement.
- All rental assistance is tenant-based; the participant selects their own housing unit and may move to another unit or building and continue assistance so long as other requirements and eligibility are met.
- The unit must have an AHS Housing Inspection conducted by the Vermont State Housing Authority⁴
 - If constructed prior to 1978, the unit must meet HUD’s lead paint requirements

Case Management Services Definitions

While acknowledging that case management should remain flexible to best serve the individual needs of households, the following definitions provide basic expectations as to what is provided.

A. Intake/Assessment: *To provide coordination at the program or community level.*

- Record basic household information to determine immediate need, and eligibility for other assistance
- Conduct an assessment to determine the amount and type of assistance and support that the individual or family needs to regain stability in permanent housing
- Determine what initial referrals may be appropriate to meet a range of household needs – including, shelter and housing, as well as mainstream services (such as childcare, parenting, employment, education, mental health, substance use treatment/recovery, legal services, etc.) and benefits (such as WIC, Reach Up, 3SquaresVt, SSI/SSDI, etc.)
- Follow-up on initial referrals to prevent a household from “falling through the cracks”

⁴ This inspection meets HUD’s required habitability standards.

B. Housing Navigation Services: *To provide logistical and housing support to households preparing to move into permanent housing.*

- Identify housing barriers, needs and preferences
- Work to address barriers to project/housing admissions (e.g., criminal record, credit report, utility arrears, unfavorable references)
- Develop an action plan for locating housing. Support housing search and placement
- Provide outreach and negotiate with landlords
- Work closely with housing providers regarding eligibility documentation and verification
- Follow-up on referrals to housing to support enrollment
- Assist with submitting rental/housing applications and understanding lease
- Ensure living environment is safe and ready for move in (facilitate inspections)
- Support compliance with fair market rent and rent reasonableness, if applicable
- Assist in arranging for/supporting move (set up utilities, moving arrangements, etc.)
- Find resources to support move-in (security deposit, moving costs, furnishings, other one-time costs)
- Provide education and training on the role, rights and responsibilities of the tenant and landlord
- Develop of a housing support crisis plan that includes early prevention/ intervention when housing is jeopardized
- Identify of other service needs/ongoing retention support needs and connect client to mainstream services and benefits

C. Essential Services Case Management: *To provide coordination for households in emergency shelter settings, ensuring basic needs are addressed and providing comprehensive referrals to mainstream services and benefits.*

- Determine (in consultation with household and other community partners, if applicable) who shall be the lead case manager for the household.
- Work with participants to develop a housing and service plan, set goals, and help participants stay on course
- Provide ongoing risk assessment and safety planning with victims fleeing violence or make appropriate referral
- Employ best practices to help the household identify its strengths and opportunities, as well as underlying issues which may have led to homelessness, or could undermine success if not addressed
- Provide information, referrals and encouragement for the household (or members of the household) to avail themselves of other appropriate services or take appropriate action to address barriers
- Assist with developing, securing and coordinating mainstream services and benefits

- Monitor and evaluate client progress
- Maintain a relationship with household, identifying the appropriate level of support without creating over-dependence
- Ensure households have appropriate services after they have moved into permanent housing, including housing retention services

D. Housing Retention Services: *To provide ongoing, individualized support and coordination for households once stabilized in permanent housing.*

- Provide early identification and intervention for behaviors that may jeopardize housing, such as late rental payment and other lease violations
- Coach on developing and maintaining key relationships with landlords/property managers with a goal of fostering successful tenancy
- Assist in resolving disputes with landlords and/or neighbors to reduce risk of eviction or other adverse action
- Advocate and link with community resources to prevent eviction when housing is, or may potentially become jeopardized
- Assist with the housing recertification process
- Coordinate with the tenant to review, update and modify their housing support and crisis plan on a regular basis to reflect current needs and address existing or recurring housing retention barriers
- Continue training in being a good tenant and lease compliance, including ongoing support with activities related to household management
- Connect the household to mainstream services and benefits

Other Guidance and Restrictions

Additional guidance on eligible and ineligible uses of HOP funds are contained in the Notice of Funding, grant agreements and guidance issued by the Office of Economic Opportunity. Grantees are encouraged to contact the Office of Economic Opportunity at (802) 241-0935 for clarification on any HOP requirements or standards.