

HOUSING OPPORTUNITY GRANT PROGRAM OVERVIEW

The Housing Opportunity Grant Program (HOP) provides funding to operate emergency overnight shelter; provide essential services to shelter guests; provide transitional housing where appropriate; rapidly re-house homeless individuals and families; prevent individuals and families experiencing a housing crisis from becoming homeless; implement coordinated entry to streamline client access to resources; and administer the Homeless Management Information System (HMIS). HOP operates within the *Home Together, Federal Strategic Plan to Prevent and End Homelessness* and the *Vermont Plan to End Homelessness*.

The primary goals of the Housing Opportunity Grant Program are to:

- Decrease the number of individuals and families experiencing homelessness;
- Shorten the length of time people experience homelessness;
- Reduce the number of individuals and families returning to homelessness; and
- Prevent people from becoming homeless.

A guiding principle of the Housing Opportunity Grant Program is to tie homeless assistance activities to permanent housing through systems, practices, and initiatives that are informed by data and proven approaches. While the program addresses the needs of homeless people in emergency or transitional shelters, the focus is to assist people to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.

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- Appendix A: Self-Declaration of Housing Status (*Example #1*)
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HOP Eligible Uses Chart ¹						
	EMERGENCY SHELTER	TRANSITIONAL HOUSING	COORDINATED ENTRY	HOMELESSNESS PREVENTION	RAPID RE-HOUSING	FINANCIAL ASSISTANCE
ELIGIBILITY	Individuals and Families defined as Homeless under categories 1-4	Individuals and Families defined as Homeless under categories 1-4	Individuals and Families defined as Homeless under categories 1-4 Individuals and Families who are defined as At Risk of Homelessness (no income limit)	Individuals and Families defined as Homeless under categories 2-4 Individuals and Families who are defined as At Risk of Homelessness (no income limit)	Individuals and Families defined as Homeless under Category 1	Individuals and Families defined as Homeless under category 1 Individuals and Families with an annual income below 50% AMI and are defined as Homeless under categories 2-4 or defined as At Risk of Homelessness
ACTIVITIES	SHELTER OPERATIONS Maintenance (incl routine repairs), Rent, Security, Fuel, Utilities, Equipment, Insurance, Food, Furnishings, Supplies necessary for shelter operation Where no appropriate emergency shelter available: Hotel or Motel voucher	OPERATIONS Maintenance (incl routine repairs), Rent, Security, Fuel, Utilities, Equipment, Insurance, Food, Furnishings, Supplies necessary for transitional housing operation	ASSESSMENT SERVICES Coordinated entry assessment and referral services for households in Coordinated Entry	HOUSING RETENTION SERVICES Ongoing, individualized support and coordination for households once stabilized in permanent housing		FLEXIBLE CLIENT-BASED FINANCIAL ASSISTANCE If tied to a housing plan: <ul style="list-style-type: none"> • Short-term rental assistance (< 4 mo.) • Security deposits or last month's rent • Moving costs (incl truck rental) • Utility deposits • Rental arrears • Home furnishings/essential goods • Debt reduction • Recovery housing/non-traditional housing program fees • Host family costs • Transportation costs • Other activities
	FINANCIAL ASSISTANCE Limited to Diversion or Rapid Exit activities		HOUSING NAVIGATION SERVICES Logistical and housing support to households preparing to move into permanent housing			
	ESSENTIAL SERVICES² <ul style="list-style-type: none"> • Case Management • Education Services (e.g. ESL, literacy, GED) • Outpatient health services • Mental health services • Onsite childcare • Legal services • Employment assistance • Substance abuse services • Transportation • Specialized services (HIV/AIDS, DV, youth) • Life skills training (e.g. conflict resolution, financial/household management, parenting, food/nutrition) 				RENTAL ASSISTANCE Medium Term Tenant-based rental assistance up to 24 months	

¹ See Grant Agreement for specific allowable activities and limitations

² Funds can only be used for emergency or outpatient health services, mental health services, legal services and substance abuse treatment to the extent that other services are unavailable or inaccessible within the community.

Definition of Homelessness

Published by HUD - November 15, 2011; Adopted by the Vermont Agency of Human Services

CRITERIA FOR DEFINING HOMELESSNESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) Is living in supervised 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, or local government programs for low-income individuals); OR (iii) Is exiting an institution where (s)he 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.
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; AND (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.
	Category 3	Homeless under other Federal statutes	<p>(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:</p> <ul style="list-style-type: none"> (i) Are defined as homeless under the Runaway and Homeless Youth Act (42 U.S.C. 5732a, section 387), the Head Start Act (42 U.S.C. 9832, section 637), the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2, section 41403), the Public Health Service Act (42 U.S.C. 254b(h), section 330(h)), the Food and Nutrition Act of 2008 (7 U.S.C. 2012, section 3), the Child Nutrition Act of 1966 (42 U.S.C. 1786(b), section 17(b)) or McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a, section 725); (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; (iii) Have experienced persistent instability as measured by two moves or more during the preceding 60-days; AND (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or GED, illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.
	Category 4	Fleeing/ Attempting to Flee Domestic Violence	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; AND (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Definition of At Risk of Homelessness

HUD Interim ESG Regulation – Congruent with definition adopted by Vermont Agency of Human Services

CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	Category 1	Individuals and Families	<p>An individual or family who:</p> <ul style="list-style-type: none"> (i) Has an annual income below 50%³ of median family income for the county⁴; AND (iv) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND (v) Meets one of the following conditions: <ul style="list-style-type: none"> (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR (B) Is living in the home of another because of economic hardship; OR (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR (F) Is exiting a publicly funded institution or system of care.
	Category 2	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.
	Category 3	Families with Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

³ Amended by OEO (only for HOP) from 30% to 50% of AMI starting in SFY2022; 30% AMI remains for all other projects.

⁴ AMI does not apply for households receiving services through Homelessness Prevention or Coordinated Entry projects.

General HOP Requirements

All HOP grantees/subrecipients, regardless of the type of project they have, must adhere to the following general requirements, consistent with HUD's Updated ESG Interim Rule ([24 CFR Part 576](#)):

1. Fair Housing

The grantee/subrecipient agrees to comply with the [Federal Fair Housing Act](#) and [Vermont's Fair Housing Act](#) to ensure that people have equal access to housing. The grantee/subrecipient will not discriminate based on: race; color; religion; religious creed; national origin; sex; disability, including serious mental illness, substance use disorder, and co-occurring disorders; familial status; marital status; age; sexual orientation; gender identity; receipt of public assistance; being the victim of abuse, sexual assault or stalking.

2. Reasonable Accommodations

The grantee/subrecipient agrees to make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary to afford a person with a disability equal opportunity to use housing or shelter, including public and common areas.

3. Affirmative Outreach

The grantee/subrecipient will make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures that the grantee/subrecipient intends to use to make known the availability of the facilities, assistance, and services will reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the grantee/subrecipient will take additional steps to ensure that those persons are made aware of the facilities, assistance, and services. The grantee/subrecipient will also take appropriate steps to ensure effective communication with persons with disabilities to ensure that interested persons receive information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. The grantee/subrecipient will also take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

4. Permanent Housing & Support Services

The grantee/subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical care, mental health and substance abuse treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for such individuals.

5. Conflict of Interest

No covered individual who participates in the decision-making process may obtain financial interest or benefit from an activity, have a financial interest in any contract, subcontract, or agreement, either for themselves or immediate family member or business ties, during their tenure or the one-year period following their tenure at the organization. The grantee/subrecipient shall fully disclose in writing any conflicts of interest or potential conflicts of interest.

6. Homeless Participation

To the maximum extent practicable, the grantee/subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in maintaining and operating facilities assisted under HOP, in providing services assisted under HOP, and in providing services for occupants of facilities assisted under HOP.

7. Non-discrimination

The grantee/subrecipient agrees to comply with the requirement of [21 V.S.A. Chapter 5](#), Subchapter 6, relating to fair employment practices, to the full extent applicable. Grantee/subrecipient shall also ensure, to the full extent required by the [Americans with Disabilities Act of 1990](#), as amended, that qualified individuals with disabilities receive equitable access to the services, programs, and activities provided by the grantee/subrecipient under HOP.

8. Confidentiality

The grantee/subrecipient will implement written procedures to ensure that:

- I. All records containing personally identifying information of any individual or family who applies for and/or receives assistance funded by HOP will be kept secure and confidential;
- II. The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under HOP will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
- III. The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the grantee/subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

9. Connection to Mainstream Benefits

Grantees/subrecipients must coordinate and integrate activities, to the maximum extent practicable, with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include: Reach Up, Head Start, Designated Agencies for mental health and developmental services, Vermont Medicaid programs, Public Housing Authorities, Division of Substance Use programs' preferred providers, Department of Labor, HireAbility Vermont, Federally Qualified Health Centers, Vermont's Homeownership Centers.

10. Coordination with McKinney-Vento Liaisons

If the project serves school-aged children, the grantee/subrecipient must coordinate with local Homeless Education Liaison(s) to identify children in their districts who are eligible for homeless education program resources, maximize and coordinate these resources, and support continuity in education whenever possible. *For more information, please review: <https://education.vermont.gov/student-support/federal-programs/consolidated-federal-programs/education-homeless-children-and>*

11. Standard State and Agency of Human Services Grant/Contract Provisions

All grantees/subrecipients are subject to the requirements stated in *Attachment C: Standard State Provisions for Contracts and Grants* and *Attachment F: Agency of Human Services' Customary Contract/Grant Provisions*. Among other requirements, these attachments speak to the following:

- Insurance
- Whistleblower Protections
- Fair Employment Practices
- Workplace Violence Prevention and Crisis Response
- Data Protection and Privacy
- Abuse and Neglect of Children and Vulnerable Adults
- Information Technology Systems
- 2-1-1 Database
- Drug Free Workplace Act
- Lobbying

Violence Against Women Act (VAWA) Requirements (rev 10.2023)

1) Overview: The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not limited to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation. The [final rule](#) regarding the implementation of housing protections authorized in the VAWA Reauthorization Act of 2013 was published in November 2016. This rule is a critical step in protecting the housing of survivors of domestic and dating violence, sexual assault, and stalking. The VAWA Statute was amended in the [VAWA Reauthorization Act of 2022](#) in March 2022 and in January 2023 the US Department of Housing and Urban Development (HUD) published the [VAWA 2022 Notice](#) to describe how the amended act affects HUD's programs. Amendments took effect on October 1, 2022.

2) Contents: No individual or family may be denied admission to or removed from a HOP-funded project (e.g., emergency shelter, rental assistance, etc.) 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.

No owner or manager of a HOP-funded project shall discriminate against any person because that person has opposed any act or practice made unlawful by the housing title of VAWA (34 U.S.C. chapter 121, subchapter III, Part L), or because that person testified, assisted, or participated in any related matter.

No owner or manager of a HOP-funded project shall coerce, intimidate, threaten, interfere with, or retaliate against any person who exercises or assists or encourages a person to exercise any rights or protections under the housing title of VAWA.

3) Applicability: HOP is funded in part by the federal Emergency Solutions Grant (ESG) from the US Department of Housing and Urban Development (HUD). Because HOP includes some federal ESG funding, all HOP grantees/subrecipients and housing providers receiving HOP funding must comply with VAWA. This protection applies to all HOP-funded projects, including emergency shelters, transitional housing, homelessness prevention and rapid re-housing programs. *See **VAWA Protections for Participants Receiving Rapid Re-Housing Assistance** in **Section 6** for additional VAWA requirements related to rental assistance.*

General Recordkeeping Requirements

HOP grantees'/subrecipient's written policies and procedures must ensure the following recordkeeping requirements are met, regardless of project type:

A. Client File Recordkeeping

1. **Documentation of Project Eligibility or Ineligibility Determination**

See the *Definition of Homelessness* and *Definition of At Risk of Homelessness* earlier in this section for specific eligibility requirements.

Eligibility must be documented for all project participants. Records must also be kept for applicants deemed ineligible for assistance.

2. **Acceptable Documentation Provisions**

See *Homelessness Recordkeeping Requirements* later in this section for additional requirements.

Acceptable documentation includes one of the following, listed in order of preference:

- a. third party verification, including written and source documentation, and HMIS records;
- b. intake worker observation/certification; or
- c. self-certification from person(s) seeking assistance.

3. **Documentation of Termination of Assistance**

Involuntary termination of services, shelter or assistance according to project policy and procedures, including any appeal by the participant.

4. **Documentation of Services and Assistance Provided to the Participant**

Including entry and exit dates into the project (e.g., emergency shelter stays, enrollment in case management, etc.). Records kept in written files and/or HMIS or comparable management information system (as noted in grant agreement) are acceptable as long as they note when the person entered the data, date of entry, and any changes made.

B. Additional Recordkeeping Requirements

1. **Coordination with the Continuum of Care and other programs**

2. **Compliance with Conflict of Interest Policy**, which includes all program personnel

3. **Financial records**, which demonstrate how HOP grant funds were spent on allowable costs in accordance with grant agreements

4. **Record Retention Policy: All records must be retained for 5 years after all funds are expended.** Please refer to each grant's close out letter for specific instructions regarding record retention.

Homelessness Recordkeeping Requirements⁵

Grantees/subrecipients must follow HUD's order of priority for documentation:

1. Third party documentation
2. Intake worker observations
3. Certification from the person seeking assistance

Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations.

HOMELESS RECORDKEEPING REQUIREMENTS	Category 1	Literally Homeless	<ul style="list-style-type: none"> • Written observation by the outreach worker; OR • Written referral by another housing/service provider; OR • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; • For individuals exiting an institution – one of the forms of evidence above AND <ul style="list-style-type: none"> ○ Discharge paperwork OR written/oral referral, OR ○ Written record of intake worker's due diligence to obtain above evidence AND certification by individual that they exited institution.
	Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave; OR • For individuals/families leaving a hotel or motel – evidence that they lack the financial resources to stay; OR • A documented and verified oral statement; AND • Certification that no subsequent residence has been identified; AND • Self-certification or other written documentation that they individual lacks the financial resources and support necessary to obtain permanent housing.
	Category 3	Homeless under other Federal statutes	<ul style="list-style-type: none"> • Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; AND • Certification of no Permanent Housing in the last 60 days; AND • Certification by the individual or Head of Household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; AND • Documentation of special needs OR 2 or more barriers.

⁵ HOP follows all of HUD's current recordkeeping requirements for homelessness status; if HUD makes updates, HOP's requirements will also be updated.

	<p>Category 4</p>	<p>Fleeing/ Attempting to Flee Domestic Violence</p>	<p>For Domestic Violence Shelter/Service providers:</p> <ul style="list-style-type: none"> • An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. <p>For non-victim service providers:</p> <ul style="list-style-type: none"> • Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; AND • Certification by the individual or head of household that no subsequent residence has been identified; AND • Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
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Case Management Service 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 project 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”

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 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 for 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

TERMINATION POLICY GUIDANCE
Housing Opportunity Grant Program (HOP)
Vermont Office of Economic Opportunity (OEO)
Updated 10/2023

All grantees/subrecipients must establish a formal process for terminating assistance provided to program participants.

At a minimum, the termination process must:

- Recognize the rights of individuals affected.
- Exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a participant's assistance is terminated only in the most severe cases.

Termination under this section does not bar the grantee/subrecipient from providing further assistance at a later date to the same family or individual.

*See **Emergency Shelter Standards** in **Section 2**, **Rapid Re-Housing Standards** in **Section 6**, and **Financial Assistance Standards** in **Section 7** for additional requirements related to termination for those project types.*