Vermont Department for Children and Families

CARES Housing Voucher Project

Statewide Policies & Procedures

The CARES Housing Voucher Project is a rapid re-housing assistance program through the Homeless Continuum of Care providing medium-term rental assistance to Vermont households who are experiencing homelessness, and is intended to prevent, prepare, and respond to coronavirus. The CARES Housing Voucher is intended to provide rental assistance and housing support for up to 18 months while the household is actively working to increase their income or secure other forms of longer-term affordable housing. The CARES Housing Voucher Project has limited funding and will operate from October 2020 – July 2022. Applications can be submitted beginning September 1, 2020. Twelve-month rental assistance vouchers will be issued from October 2020 through July 2021. Vouchers will have an option to extend in increments of three to six months, with a limit of an additional 6 months, through July 2022.

The CARES Housing Voucher Project is supported with Vermont's allocation to the HUD Emergency Solutions Grant (ESG) Program through the CARES Act. Unless otherwise established in this document, the CARES Housing Voucher Project will follow all Housing Opportunity Grant Program standards. The CARES Housing Voucher Project will meet all requirements as established in 24 CFR Part 576, unless otherwise waived or altered per the HUD ESG Notice CPD-20-08, CPD-21-05 or CPD-22-06. ESG CARES funds are intended to help prevent, prepare for, and respond to the coronavirus.

Housing secured under this program is subject to state and federal fair housing law, which prohibits against discrimination based on race, color, religion, national origin, sex, disability, family status, age, marital status, sexual orientation, gender identity, being a victim of domestic violence, sexual assault, or stalking, and receipt of public assistance.

Who is eligible for a CARES Housing Voucher?

- 1) The household meets the AHS/HUD definition of homeless in 24 CFR 576.2 and the recordkeeping requirements in 24 CFR 576.500(b), (c), (d), and (e), specifically:
 - Program participant eligibility for the CARES Housing Voucher Project (a rapid re-housing activity) is limited to families and individuals who meet the criteria under paragraph (1) of the HUD Definition of Homelessness (Appendix A), or who meet the criteria under paragraph (4) and live in an emergency shelter or other place described in paragraph (1) of the definition.
 - https://files.hudexchange.info/resources/documents/HomelessDefinition RecordkeepingReq uirementsandCriteria.pdf
- 2) The household does not receive rental assistance through any other subsidized housing program and
- 3) The household's **net** monthly income (income minus expenses) cannot be less than 30% of total monthly income, as the household will be required to pay 30% of income towards

housing costs. In some cases, a household may apply for a higher portion of rent to be supported by the CARES Housing Voucher.

a. If the household is unable to pay their portion of rent, or experiences difficulties paying, they are encouraged to apply for the CARES Housing Voucher Program to pay up to 100% of their rent using Appendix T and submitting the request to CARES.HVP@cvoeo.org.

STEP 1: REFERRED for a CARES Housing Voucher

Households are identified and referred through the local Coordinated Entry Process. Households must have completed a Coordinated Entry assessment and be on the local Master List.

Vouchers will be allocated to each local Homeless Continuum of Care. From time to time, the Office of Economic Opportunity may re-evaluate voucher utilization, remaining funds, and needs, and reallocate any remaining vouchers among the local Continuums of Care.

When there is an open CARES Housing Voucher, the local Continuum of Care may make a referral to a designated local CARES Housing Support Agency. All referrals must follow the prioritization policy of the Chittenden Homeless Alliance or Vermont Coalition to End Homelessness.

All CARES Housing Voucher participants must enroll with the local CARES Housing Support Agency, even if their primary service provider is different.

STEP 2: APPLY for a CARES Housing Voucher

Once identified by the local Homeless Continuum of Care, an application must be fully completed and signed by the applicant household and the local CARES Housing Support Agency.

Applications are submitted to the statewide CARES Voucher Rental Assistance Administrator:

Champlain Valley Office of Economic Opportunity (CVOEO)

All applications must be accompanied by:

- A local Coordinated Entry letter verifying the referral.
- Documentation of eligibility.
- Documentation of income.

CVOEO will verify eligibility and, if needed, request additional information. Incomplete or unsigned applications will be denied but can be resubmitted once corrected.

STEP 3: TENTATIVE APPROVAL for a CARES Housing Voucher

Applicants who meet the eligibility criteria and are referred through the Coordinated Entry process will be tentatively approved by CVOEO for a CARES Housing Voucher.

The tentative approval notice will include:

- The portion of rent the applicant is responsible for each month.
- The rental unit size.
- The maximum allowable rent plus utilities, and the option to request a waiver of this maximum
- The maximum allowable security deposit (up to three times the value of one month's rent).
- The county in which the rental unit should be located.
- Next steps, including additional unit requirements, that must be verified.

See Appendices for additional information on these requirements.

Applicants must locate a rental unit within 60 days from the date of tentative approval notice. The rental unit must meet the criteria for size and maximum allowable rent, pass a housing inspection, and be located within the county indicated in the tentative approval notice. CVOEO will deny the application if the applicant has not located a rental unit meeting these criteria within 60 days of the date of the tentative approval notice; however, a thirty-day extension may be requested by the applicant and granted when they can demonstrate that they have been actively seeking housing. There are no limits on the number of extensions, but this opportunity ends once the lease-up period of the program ends.

The limitations on unit size laid out in <u>Appendix D</u> should not create onerous barriers for households to identify appropriate housing. If housing opportunities or needs arise that do not fit within these constraints, participants may request a waiver by contacting CVOEO.

If an application is denied, the applicant may appeal this decision.

If the unit does not meet the Fair Market Rent Standard, the participant must request an FMR waiver and still meet Rent Reasonableness Standards in <u>Appendix C</u> and send it to CARES.HVP@cvoeo.org

STEP 4: FINAL APPROVAL for a CARES Housing Voucher

To obtain final approval for a CARES Housing Voucher, an applicant must submit the following documentation to CVOEO within 15 days of notifying CVOEO that a rental unit has been located:

- Notice that the unit has passed the housing inspection.
- Executed lease agreement with completed CARES Housing Voucher lease addendum.

CVOEO shall deny the application if the above documentation is not accurately completed and received within 15 days of receiving notification that a rental unit has been located. The applicant can appeal this decision.

CVOEO will sign the CARES Housing Voucher lease addendum and return it to the landlord, the participant, and the housing support worker.

STEP 5: Work on Long-term Housing Plans

CARES participants shall not be required to receive treatment or perform any other prerequisite activities as a condition for receiving rental assistance. However, participants are asked to meet with a housing support worker not less than once per month to develop and implement a plan to assist the participant in ensuring long-term housing stability.

Together, the participant and housing support worker will develop a plan to assist the participant in retaining permanent housing after the CARES Housing Voucher ends, taking into account participant's current and expected household budget, additional sources of assistance, and affordability of area housing.

The housing support worker will help the participant connect to mainstream benefits and services which may support the participant, including employment training and support programs, financial capability education, and resources on tenant rights and responsibilities.

The participant will apply for a longer-term affordable housing with housing authorities and local affordable housing providers.

Support Services Only

CARES Housing Support Agencies may provide rapid re-housing relocation and stabilization services to eligible households, even if they do not receive a CARES Housing Voucher.

For the CARES Housing Support Agency to enroll participants for CARES Housing Support the following must be true:

- All CARES Housing Voucher participants within the service area (e.g., local CoC) are already being serviced by a CARES Housing Support Agency.
- The CARES Housing support worker has a caseload less than or equal to 1:20.
- The participant referred for "services only" is referred through the Coordinated Entry process and meets the eligibility criteria for the CARES Housing Project.
- The participant is receiving rental assistance from another funding source or will apply for and expect to receive rental assistance from VERAP, and voluntarily wants to enroll in housing retention support services through the CARES Housing Project.

CARES Housing Support can be provided from October 2020 – July 2022. CARES Housing Support Services are Rapid Re-housing Stabilization Services intended to support households in finding and retaining permanent housing. (24 CFR 576.105(b)(1)(2))

These services include:

Housing Navigation Services: To provide logistical and housing support to households preparing to move into permanent housing. (24 CFR 576.105(b)(1))

Housing Retention Services: To provide ongoing, individualized support and coordination for households once stabilized in permanent housing. (24 CFR 576.105(b)(2)

See HOP Consolidated Program Guidance p. 7-8 for a detailed description of services and the document "CARES Housing Project – Notice on Support Services Only (SSO)" for more information.

Ongoing Eligibility Requirements

1) CARES Housing Voucher shall continue for 12 months unless the participant:

- Receives another housing subsidy or voucher (e.g., Housing Choice Voucher, Family Unification Voucher, Shelter + Care);
- Is evicted (excluding no cause or sold property evictions); or
- Has not paid their portion of the rent for three or more months.

The CARES participant can continue to receive CARES Rapid Re-housing Services, even after the CARES Housing Voucher has ended, so long as they are still eligible, subject to annual re-evaluation.

2) Re-evaluation of income and participant portion of rent.

<u>Prior to twelve months, income and participant portion of rent will only be re-evaluated at the request of the participant.</u> For example, a participant whose income has decreased, or has experienced financial hardship, may request a recalculation of the tenant portion of rent.

If requested, CVOEO will review current income documentation and recalculate the tenant portion of rent based on current income or financial hardship. CVOEO will notify the landlord, housing support worker and participant of any changes and when they will take effect.

3) At 12 months, the CARES Housing Vouchers may be extended in increments of up to six months.

For each extension requested, the household will submit an updated <u>CARES Housing Voucher Review Form</u>, signed by the participant and the housing support worker. The review form must be received by CVOEO no later than the first day of the last approved payment month. The Review Form must include:

- Participant's current housing status and progress on long-term housing plans.
- Documentation of current household income and resources.

So long as the review form is submitted on time, and so long as funding is available, a three-to-six-month extension will be approved if:

• The participant is a tenant in good standing.

- The participant is in the process of securing a longer-term housing subsidy (e.g., have already applied to housing authorities and affordable housing providers), or has been working to increase income.
- The participant does not have annual income that exceeds 50% of median family income.
- The participant lacks sufficient resources and support networks necessary to retain housing without a CARES Housing Voucher.

4) Unit Transfer: Appendix U

CARES participants with a CARES Housing Voucher may transfer their CARES Housing Voucher to a new unit by filling out <u>Appendix U – Voucher Transfer Request</u>. All requests are subject to program review, approval and available funding. If the participant is approved for a transfer, they will have until June 30th, 2022 to find housing. If the participant is unable to find a unit by that date, the participant will be closed from the CARES Housing Voucher Project. Any new housing unit must meet all CARES Housing Voucher Program requirements as outlined in the policies and procedures, including habitability standards and Fair Market Rent (FMR) and Rent Reasonableness Standards.

Duplication of Benefits

Program participants may not receive duplicative payment of program expenditures on their behalf.

Prior to participant enrollment, the following steps shall be taken:

- 1. As part of the application, participants identify all housing or other assistance that they have received, or are currently or anticipate receiving, and certifies to the accuracy of the information provided.
- 2. CVOEO reviews the application to ensure no other program is providing rental assistance or security deposits. In the case of moving assistance, the request for assistance identifies other leveraged sources and the portion of costs requested.

Assistance with Moving Costs

The CARES Housing Voucher Program makes funds available to pay for moving costs to help active participants in the CARES Housing Program Voucher Program move into permanent housing. (24 CFR § 576.105(a)(6) -)

CARES Housing Program funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance from the CARES Housing Support Agency and before the program participant moves into permanent housing.

CARES funds can allow storage for people approved for a transfer while participants search for new housing.

CARES Housing Voucher Program Moving Cost Assistance Policies:

Moving cost assistance is only available for participants receiving a CARES Housing Voucher.

The CARES Housing Voucher Program will pay up to 100% of the total moving costs, if the participant can demonstrate they do not have resources to contribute to the cost.

Additionally:

- The total amount of moving cost assistance may not exceed \$1,000 per household.
- Moving cost assistance is not guaranteed and will be based on the availability of funds on a first come, first served basis.
- An applicant must submit a complete and signed application form along with an estimate from the chosen service provider.
- If denied, a participant can follow the appeal process and guidelines.
- No reimbursements can be made to agencies or participants.
- Payment of temporary storage fees in arrears are not eligible.
- Sales tax may not be paid with these funds.
- Approval of a request and, if approved, payment can take up to 2 weeks.

Applying For Assistance:

- 1. Complete this form
- 2. Email completed form, along with an invoice, to CARES.HVP@cvoeo.org.

Or mail it to: Cares Housing Voucher, PO Box 1603, Burlington, VT 05402

APPENDICES

- Extension Request Form
- Appendix A Definition of Homelessness & Documentation Requirements
- Appendix B Income Verification & Client Portion of Rent
- Appendix C Fair Market Rent & Rent Reasonableness
- Appendix D Determining Unit Size
- Appendix E Housing Inspection
- Appendix F. Coordinated Entry Prioritization & Verification
- Appendix G CARES Housing Voucher Application
- Appendix I VAWA Requirements
- Appendix J Client Notice of Rights
- Appendix K Lease Addendum
- Appendix L VAWA Property Owner Rights
- Appendix M VAWA Certifications
- Appendix N Emergency Transfer Request
- Appendix O VAWA Release
- Appendix P Self-Declaration of Housing Status
- Appendix Q Information for Landlords
- Appendix R Income Self-Certification Form
- Appendix S Grievance & Appeal Process
- Appendix T Request for Increase in Rental Assistance
- Appendix U Voucher Transfer Request

- Appendix V CARES Housing Voucher Review Form
- Notice on Support Services Only

Version History:

- 8/24/20 Original version
- 9/30/20
 - Added information about the option to request a waiver of the maximum allowable rent.
 - o Increased extension on housing search from fifteen days, to thirty days.
 - o Removed all language requiring clients to engage in case management.
- 8/27/21
 - Updated the previous 30% median household income to qualify for an extension of benefits, to 50% median household income, based on HUD waiver.
- 5/8/22
 - Changed June 2022 end of program to July 2022 end of program.
 - Changed extending vouchers in increments of three months, to add a limit of 6 additional months
 - o Added links and more specific details regarding HUD regulations
 - Incorporated information regarding increased voucher payment and 0% rent contribution
 - Lifted all limits on the number of housing search extensions
 - Information was added regarding the opportunity to request a waiver in regard to unit size
 - The applicant has the right to appeal a denied application
 - The applicant can request an FMR waiver
 - Incorporated information regarding Support Services
 - o Incorporated information about unit transfer
 - Incorporated information regarding moving costs
- 6/14/22
 - Language is changed from "client" to "participant"
 - Incorporated information regarding duplication of benefits