

CARES Housing Project - Notice on Support Services Only (SSO)

(Updated 8/25/21)

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. This notice outlines intake eligibility and evaluation, additional requirements, and allowable case management activities for CARES Housing Support Agencies to be able to enroll and serve participants into their project as “Support Services Only” participants.

A CARES Housing Support Agency may or may not have the capacity to provide housing support services to households that are not receiving a CARES Housing Voucher. For the CARES Housing Support Agency to enroll clients for CARES Housing Support the following must be true:

- All CARES Housing Voucher recipients 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 client referred for “services only” is referred through the Coordinated Entry process and meets the eligibility criteria for the CARES Housing Project.
- The client 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 – June 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.

Who is eligible for CARES Housing Support Services Only (SSO)?

- 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_RecordkeepingRequirementsandCriteria.pdf

The household must be eligible at the point of referral and enrollment in the CARES Housing Project.

Referrals to for CARES Housing Support Services

The local CARES Housing Support Agency lets the local Coordinated Entry Partnership know when they have openings in their caseload for new households to enroll for support services only. 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.

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.

Enrolling the Household in the local CARES Housing Support Project

Once referred by the local Homeless Continuum of Care, the local CARES Housing Support Agency must determine and verify the household's eligibility to enroll them in the project. All case files must include:

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

Additional Requirements for CARES Housing Support

The CARES Housing Support Project is supported by the HUD Emergency Solutions Grant (ESG). ESG regulations require that all participants, regardless of whether they receive a CARES Housing Voucher, must also meet the following requirements:

- **Habitability Inspection for permanent housing.** This requirement applies even when the household will not be receiving a CARES Housing Voucher. As outlined in [ATTACHMENT A](#) of this document.
- **Lead-based Paint Requirements,** as outlined in [ATTACHMENT A](#) of this document.
- **Recordkeeping Requirements,** as outlined in the [HOP Consolidated Program Guidance \(pages 14-15\)](#).
- **Conflict of Interest:**
The provision of services may not be conditioned on the household's acceptance of occupancy in shelter or housing owned by the local CARES Housing Agency, nor a

parent or subsidiary. The local CARES Housing Support Agency must maintain written standards of conduct covering organizational conflicts of interest. Additional conflict of interest requirements are outlined in 24 CFR § 576.404.

Work on Long-term Housing Plans

Clients are not required to receive treatment or perform any other prerequisite activities as a condition for receiving services through the CARES Housing Project. The CARES Housing Support Agency may not require clients to meet with them; however, clients are asked to meet with a housing support worker not less than once per month to develop and implement a plan to assist the client in ensuring long-term housing stability. Together, the client and housing support worker will develop a plan to assist the participant in retaining permanent housing after the CARES Housing Support Services ends, taking into account participant's current and expected household budget, and additional sources of assistance and services.

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

Together, the client and the CARES Housing Support worker will determine how long the client will be enrolled in the CARES Housing Project. Services may continue until the project ends in June 2022.

Ongoing Eligibility Requirements

If a client is enrolled in the CARES Housing Project for more than a year – even when the client is receiving support services only – the local CARES Housing Support Agency must re-determine and verify the client is eligible for ongoing enrollment in the project. Re-evaluation of eligibility shall happen not less than once annually and includes the following:

- The client does not have annual income that exceeds 50% of median family income.
- The client lacks sufficient resources and support networks necessary to retain housing without participation in the CARES Housing Project.

Comparison of CARES Housing Project Requirements for Housing Voucher vs. Support Services Only Participants

Requirement	Required?	
	CARES Housing Voucher (Rental Assistance)	CARES Housing Support Services Only (SSO)
Referred via Coordinated Entry	YES	YES
Eligibility for ESG CARES	limited to families and individuals who meet the criteria under paragraph (1) of the HUD Definition of Homelessness – “literal homeless”	
Determines and Documents CARES Housing Project Eligibility	YES –by CVOEO, Rental Administrator	YES –by the local CARES Housing Agency
Fair Market Rent or Rent Reasonableness	YES	NO
Signed Lease	YES	NO
Rental Assistance Agreement	YES	NO
VAWA Lease Addendum	YES	NO
Habitability Inspection	YES	YES
Lead Paint (pre-1978 units)	YES	YES
Pamphlet - Disclose known lead		
Lead Paint (pre-1978 units & children < 6yrs or pregnant women)		
Visual Assessment - Paint Stabilization - Clearance Testing		

Post Assistance Housing Stability Plan	YES	YES
Annual Income Eligibility Review	YES	YES

APPENDICES

- [Appendix A - Definition of Homelessness & Documentation Requirements](#)
- [Appendix B - Income Verification & Client Portion of Rent \(not](#)
- [Appendix E - Housing Inspection and Lead Based Paint Requirements](#)
- [Appendix F. Coordinated Entry Prioritization & Verification](#)
- [Appendix P - Self-Declaration of Housing Status](#)

CARES HOUSING SUPPORT SERVICES ONLY

ATTACHMENT A

Housing Inspection

As with CARES Housing Voucher units, all CARES Housing Support units must also pass the habitability standards for permanent housing established in 24 CFR part 576.403(c).

The CARES Housing Voucher Project uses the AHS Housing Inspection (or Housing Quality Standards Plus) performed by the Vermont State Housing Authority. CARES Housing Support agencies may use this inspection process or may conduct the inspection themselves.

To request an AHS inspection, the organization must use the AHS Housing Inspection Request form found here: <https://dcf.vermont.gov/sites/dcf/files/OEO/Docs/Housing-Inspection-Request.pdf>

If the housing support agency decides to conduct the inspection themselves:

See the checklist below for requirements.

The client file must include notice that the unit (as noted by address) passed inspection, and it also met the **Lead Based Paint requirements detailed below, if applicable.**

<p style="text-align: center;">HABITABILITY STANDARDS FOR PERMANENT HOUSING (24 CFR part 576.403(c))</p>	<p style="text-align: center;">Meets Standard Yes/No</p>
<p>1. <i>Structure and materials:</i> The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.</p>	
<p>2. <i>Space and security:</i> Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.</p>	
<p>3. <i>Interior air quality:</i> Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.</p>	
<p>4. <i>Water Supply:</i> The water supply must be free from contamination.</p>	
<p>5. <i>Sanitary Facilities:</i> Residents must 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.</p>	
<p>6. <i>Thermal environment:</i> The housing must have any necessary heating/cooling facilities in proper operating condition.</p>	
<p>7. <i>Illumination and electricity:</i> The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.</p>	
<p>8. <i>Food preparation and refuse disposal:</i> All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.</p>	
<p>9. <i>Sanitary condition:</i> The housing must be maintained in a sanitary condition.</p>	
<p>10. <i>Fire safety:</i> All three conditions below must be met to meet this standard.</p> <p>(i) There must be a second means of exiting the building in the event of fire or other emergency.</p> <p>(ii) Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.</p> <p>(iii) The public areas of all housing must be 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, community rooms, day care centers, hallways, stairwells, and other common areas.</p>	

CARES HOUSING SUPPORT SERVICES ONLY LEAD-BASED PAINT REQUIREMENTS

All apartments built prior to 1978, must comply with HUD's Lead Paint Standards unless, X-ray or laboratory testing of all painted surfaces has been conducted, in accordance with HUD regulations, and found not to contain lead-based paint, or the building has been substantially renovated and all painted surfaces have been replaced.

Unless the building is exempt as outlined above, the client must receive:

1. Lead Hazard Information Pamphlet available here:
https://www.epa.gov/sites/production/files/2013-09/documents/lead_in_your_home_brochure_land_color_508.pdf
2. A Disclosure report that provides information concerning lead-based paint or lead-based paint hazards in the unit and the exterior of building. If known, the landlord must disclose information such as the location of the lead-based paint and/or lead-based paint hazards, and the condition of the painted surfaces. A sample disclosure form is available here:
https://www.epa.gov/sites/production/files/documents/lesr_eng.pdf

If the unit will house children under 6 years of age, or pregnant women, then the housing support agency must also:

3. Arrange for a HUD certified inspector to conduct an annual Visual Assessment of painted surfaces to identify deteriorated paint. OEO will conduct this Visual Assessments when conducting the annual Habitability Inspection. If the apartments are scattered site or transition in place to permanent housing, then OEO may request that the inspections be done by the VSHA.
4. Complete paint stabilization of deteriorated paint by repainting deteriorated surfaces. This work must be done in compliance with Vermont's Lead Laws.
5. Arrange for a post stabilization clearance inspection by a HUD certified inspector, unless the stabilization work was de-minimus, as defined by HUD.
6. Incorporate ongoing Lead Based Paint maintenance practices. HOP funds cannot be used to repair or stabilize paint.

The presence of a non-exempt apartment in a building triggers the need for the exterior of the building to comply with these lead paint regulations.

These units must also comply with Vermont's Essential Maintenance Practices. Any lead abatement work done in a shelter must comply with Vermont Regulations for Lead Control:

http://healthvermont.gov/sites/default/files/documents/2016/11/ENV_AL_VRLCFINAL0912.pdf