


<b>Category:</b>	Housing	<b>INCA Community Services ESG Program Standards</b> 
<b>Sub-Category:</b>	Emergency Solutions Grant	
<b>Effective Date:</b>	4/16	
<b>Revised Date:</b>	4/18, 5/19, 4/20, 2/21	
<b>Forms:</b>		
<b>Reference:</b>	24 CFR Part 576.10, 401	
<b>Evaluation of Individual and Families Eligibility</b>		
<b>Policy</b>		
<p>INCA Community Services, in accordance with the Department of Housing and Urban Development guidelines developed standard policies and procedures for evaluating individuals and families eligibility for assistance under Emergency Solutions grant. Each family who may be at-risk of homelessness should be assessed in a standard way to provide prevention and diversion services to meet the client’s immediate housing crisis needs. INCA provides rapid rehousing and preventive assistance as necessary to help a homeless individual or family.</p> <p>The household must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed.</p>		
<b>Assessment (Evaluation) (24 CFR 576.401)</b>		
<p>INCA will conduct an initial (assessment) to determine each individual or family’s eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.</p>		
<b>Eligibility</b>		
<p>Households must meet the HUD’s definition of homelessness under Category 1 or Category 4, any subsequent ESG Program Notice of Funding Availability eligibility requirements and any additional funding eligibility requirements.</p>		
<b>Process of Evaluation</b>		
<p>Households must willingly engage in a process designed to coordinate program participants intake, screening, assessment and provision of service.</p>		
<b>Intake (screening)</b>		
<p>The assessment element shall be composed of a pre-screening tool which determines if a more in-depth assessment is necessary.</p> <ul style="list-style-type: none"><li>Initial Intake will consist of completion of the agency intake form with basic information.</li></ul>		

- If a more detailed assessment is necessary, potential participants will be informed of what documentation of homeless status and income verification will be needed for in-person assessment.
- Documents required for the Homeless ESG Program are:
  - Photo ID for all adults and youth over the age of 18;
  - Copy of Social Security Cards;
  - Proof or other documentation to prove their claim as being homeless;
  - Proof of income (if they have income)
  - Proof or other documentation to prove their claim as being evicted from their residence or homeless.

### **Initial Consultation and Eligibility Determination**

The household will receive an initial consultation and eligibility assessment to determine income and housing status eligibility and the appropriate type of assistance needed to regain stability in permanent housing. This assessment shall be used to evaluate risk factors, vulnerabilities and severity of service needs.

- The most current version of the SEO CoC Assessment Tool shall be used for the appropriate population.
- Eligibility is then determined based on program requirements.
- If the household is ineligible the appropriate referrals should be made.
- The household will receive appropriate supportive services and referrals essential to achieving independent living through other federal, state, local and private assistance.
- Housing Stability Plan will be completed:
  - Needs assessment to include specific housing and self-sufficiency goals;
  - Action steps to retain permanent house after ESG assistance ends;
- Individuals participating in the assessment process are allowed to decide what information they shall provide during the process. If they refuse to answer assessment questions, they will receive referrals without retribution or limiting their access to other forms of assistance. Staff shall communicate how the refusal of information could impact referral options.

### **ESG Assistance Packet**

- Client Case Notes
- SE CoC Assessment Tool
- Client Intake (Assessment)
- Verification of Income
  - Source documents provided by an outside source. Third party documentation is the preferable form of verification and includes but is not exclusive to written statements or documents from employer, landlord, public benefit worker, or agency service provider. Written verification sent directly to program staff or via the applicant is preferred.
  - Self-Declaration of Income - Documentation is only used when documented staff efforts verify that third-party or worker observation documentation is not available. However, lack of third party documentation must not prevent an individual or household from being given services or immediately accessing domestic violence/victim service shelter and assistance.
  - Certification of Zero Income

- Under \$5,000 Asset Certification or Sworn Statement of Net Household Assets
- Income & Non-Cash Benefits Worksheet
- Income Calculation
- Assessment Worksheet
- Self Declaration of Housing Status
- Homeless Certification
- Staff Affidavit
- Housing Stabilization Plan
- Homeless Management Information System (HMIS) Release of Information - All clients shall sign a release of information prior to being entered into HMIS. This release of information allows client data to be shared between participating organizations in HMIS and allows the CoC to securely store client information in HMIS. Clients may opt out of the release entirely, or may choose to leave specific agencies and partners off of the release.
- Authorization for Request and Release of Confidential Information
- Rehabilitation Re-Housing Services Worksheet
- Homeless Prevention Services Worksheet
- Program Agreement
- Rent Reasonableness Checklist and Certification
- Lead Screening Worksheet
- Landlord Contract
- Inspection Checklist
- Program Exit

## **Eligible households**

### **Rapid - Rehousing**

- Eligible households must be “literally homeless” (must meet the Category 1 or Category 4 of the Homeless Definition) in INCA’s Service area and have a combined household income that is at or below 30% of Area Median Income, as established by HUD.)

### **Homeless Prevention - Eligible Households must be:**

- At risk of homelessness in INCA’s Service area and
- Have a combined household income that is at or below 30% Area Median Income, as established by HUD and
- 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
- Meets one of the following conditions:
  - Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; or
  - Is living in the home of another because of economic hardship; or
  - 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
  - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government Sub-recipients for low-income individuals; or

- 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
- Exiting a publicly funded institution or system of care; or
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved plan

## **Documenting Income**

Income is money that is paid to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member 18 years or older. (Victims fleeing domestic violence do not have to report the abuser's income.) Income includes the current (not projected) gross income (annualized) of all adult (18 years and older) household members and unearned income paid to an adult attributable to a minor.

### **Inclusions**

The following types of income "inclusions" must be counted when calculating current gross income:

- Earned income
- Self-Employment/Business Income
- Interest & Dividend income
- Pension/Retirement income
- Unemployment & Disability income
- TANF/Public Assistance
- Alimony and child support income
- Armed Forces income

### **Exclusions**

- Income of children (under 18)
- Inheritance and insurance income
- Medical expense reimbursement
- Income of live-in aides
- Certain state payments regarding disability
- Student financial aid
- Armed Forces Hostile Fire pay

### **Annualizing Wages and Periodic Payments**

- When calculating income based on hourly, weekly, or monthly payment information, add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:
  - Hourly Wage multiplied by Hours Worked per Week multiplied by 52 weeks
  - Weekly Wage multiplied by 52 weeks
  - Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
  - Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
  - Monthly Wage multiplied by 12 months

- The definition of income reflects a household's income at the time they are seeking assistance.
- Accordingly, documents and information collected to verify income should be recent.
- Documentation dated within 30 days is acceptable.
- However, for public assistance benefits (e.g., SSI, food stamps), a benefits statement received any time within the twelve months prior to the time of application and reflecting current benefits received by a household is allowed.
- A copy of a recent bank statement indicating direct deposit is also acceptable.

#### **Range of Documentation Types in Order of Preference**

- Third Party – Source
- Third Party – Written
- Self Certification

#### **Victim Safety Planning**

INCA recognizing the importance of addressing the safety needs of those individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, human trafficking or stalking, but who are seeking shelter or service. When an individual or family is actively fleeing INCA shall make every effort to connect the individual with a victim services provider. The services provided may be shelter, but may also be advocacy, safety planning and peer counseling. If, when an assessment is being conducted, a household is determined to be at imminent risk of harm due to domestic violence, the case manager shall immediately assist the household to connect with Domestic Violence Services by calling the local domestic violence provider or local law enforcement and tending to their immediate transportation and security needs.

Individuals and families will not be denied access to the coordinated entry process on the basis that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

#### **Clients Fleeing Domestic Violence**

If INCA comes in contact with a person fleeing domestic violence, we will attempt to refer the client to a victim service provider. If the client does not wish to be referred, the provider shall follow CoC protocol for victims fleeing domestic violence.

#### **Prioritization**

INCA operates with as few barriers to entry as possible and makes assistance available to anyone who needs and wants them. INCA will use the first come first serve priority system to prioritize eligible families and individuals receiving homeless prevention and rapid re-housing services.

Once eligible for the ESG services, the participants' needs will be prioritized from the greatest needs (Food, shelter, or prevention services) to the lesser needs (Jobs, counseling, etc). In order to stabilize the family and work with them to overcome the barriers that put them in that situation.

#### **Case Management - Rapid Re-housing**

INCA will assess housing and service needs and arranging/coordinating/monitoring the delivery of individualized services. Services will include:

- Initial evaluation; verifying and documenting eligibility
- Counseling
- Determination of Rapid-Rehousing Assistance needed:
  - Short term assistance will be given;
  - Temporary housing (Hotel/motel voucher);
  - Transportation;
  - Food and essentials;
- Developing/securing/ coordinating services
- Helping to obtain federal, state, and local benefits
- Providing outreach and referral to other mainstream services;
- Developing an individualized housing/service plan
- Monitoring/evaluating participants' progress
- House Search and Placement (24 CFR 576.105(b)(2))
  - Assessment of housing barriers, needs and preferences
  - Housing search and outreach to and negotiation with owner
  - Assistance with submitting rental application and understanding leases
  - Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness
  - Assistance with obtaining utilities and making moving arrangements

#### **Case Management - Homeless Prevention**

INCA will assess housing and service needs and arrange/coordinate/monitor the delivery of individualized services to assist the program participant to retain permanent housing after assistance ends. Services will include:

- Initial evaluation; verifying and documenting eligibility
- Counseling
- Determination of Homeless Prevention Assistance needed;
- Developing/securing/ coordinating services;
- Helping to obtain federal, state, and local benefits;
- Providing outreach and referral to other public or private assistance available;
- Developing an individualized housing/service Plan;
  - Consideration of current and expected incomes and expenses;
- Relative affordability of the available housing in area;
- Monitoring/evaluating participants' progress;

#### **Meetings with Case Manager**

- Program participants must meet with a case manager to assist the program participant in ensuring housing stability.
  - No Income participants - Daily until permanent housing or relocation can be obtained.
  - Income participants - Daily until permanent housing can be obtained.
  - Preventative and Rapid Rehousing participants - Not less than once every three months for those receiving homeless prevention assistance and not less than once a year for those receiving rapid rehousing. Every 30 days until they exit the program and then complete a 90 day, 180 day, and 365 day followup.

#### **Re-evaluations (24 CFR 576.401(e)(i))**

INCA provides short term rapid rehousing and preventive services. Participants are to meet with a case manager not less than once per month to assist in ensuring long-term housing stability. Not less than once every three months for those receiving homeless prevention assistance and not less than once a year for those receiving rapid rehousing.

- Rapid Re-housing and Preventive services:
  - Household eligibility and the types and amounts of assistance the household needs will be reevaluated and documented not less than once every month for households receiving rapid-rehousing or preventative assistance during the duration of their entrance into the program.
- Each re-evaluation of eligibility must establish that:
  - The household does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD: and
  - The household lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

#### **Program Participant notification of changes**

- The household is responsible for notifying INCA Community Services (INCA) of changes in their eligibility status and circumstances that affect the need for assistance within ten (10) days of the change. Case managers will re-evaluate the household within five (5) days after receiving and reviewing the eligibility change.

#### **Confidentiality of Program Participants Records**

INCA will ensure the program participants' records are maintained in a confidential manner and keep written records or files pertaining to households under lock and key with designated personnel granted access to those files.

#### **Dissemination of Policy**

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.