

# Prevention

ESG 2016-2017

Georgia Department of  
Community Affairs

## Prevention

- **Prevention** is most efficiently implemented when targeted to those at greatest risk of losing housing. Households receiving this funding must have an income level below 30% AMI and must demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under Category 1 of the homeless definition.

## Financial Services

- Moving costs
- Rent application fees
- Security deposit
- Last month's rent
- Utility deposit
- Utility payments

## Housing Relocation and Stabilization Services

- Housing Search & Placement
- Housing Stability Case Management
- Mediation
- Legal Services
- Credit repair

## Rental Assistance

- ❑ Short-term – Up to 3 months
- ❑ Medium-term – More than 3 months, up to 24 months (DCA generally limits to 12 months)
- ❑ Rental arrears – One-time payment for up to 6 months of arrears
- ❑ Typically tenant-based for Prevention
- ❑ Total monthly rent must not exceed FMR

## Eligibility Criteria-Housing Status

- ❑ Prevention
  - ❑ “At-risk” definition (21 days)
  - ❑ CATEGORY 2 – Imminent Risk (14 days) including hotel stays with own money
  - ❑ CATEGORY 4 – Fleeing/Attempting to Flee DV
  - ❑ What about CATEGORY 3?

## Documenting Housing Status

Preferred order of documentation:

1. Third-party documentation (source preferred, then oral verification)
2. Intake worker observation (staff)
3. Self-Certification (client)

Same for risk factors (prevention)

## At-Risk of Homelessness

- The household has income below 30 percent of median income for the geographic area;

**AND**

- the individual or family has insufficient resources immediately available to attain housing stability.

- Sufficient resources or support networks are family, friends, or faith-based or other social networks immediately available to prevent them from moving to a shelter or living outside

**AND**

## At-Risk of Homelessness

### ...AND

- Meets one or more of following:
  1. Moved 2 or more times in previous 60 days for economic reasons
  2. Living with others due to economic hardship
  3. Notice of eviction (within 21 days)
  4. Living in hotel/motel (at own cost)
  5. Living in overcrowded housing (more than 2 persons for SRO/efficiency, more than 1.5 persons per room for larger housing)
  6. Exiting an institution
  7. Otherwise lives in housing that is unstable (see ESG Guidebook for more info)

## At Risk of Homelessness Verification

- Documentation of income calculation in accordance with 24 CFR 5.609
- Documentation showing lack of sufficient resources **and** risk factors
  - Termination letter, bank statement, bills showing arrears, etc.
  - Written statement by relevant third party
  - Written statement by intake staff

## Homeless Verification

### CATEGORY 2

An individual or family who will imminently lose their primary nighttime residence provided for whom:

- ❑ A court order resulting from an eviction action that requires the individual or family to leave their residence **within 14 days** after the date of their application for homeless assistance **OR**
- ❑ The equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law.

## Homeless Verification

### CATEGORY 2

For applicants whose primary nighttime residence is a hotel or motel room **not** paid for by charitable organizations or federal, state, or local government programs:

- ❑ Evidence that the individual or family lacks the resources necessary to reside there for **more than 14 days** after the date of application for homeless assistance **OR**
- ❑ An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than **14 days** after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible.
- ❑ To be found credible, the oral statement must:
  - ❑ Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance **and**
  - ❑ Be documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement

## Homeless Verification

### CATEGORY 2

If the intake worker is unable to contact the owner or renter:

- ❑ The intake worker must provide written documentation certifying that he/she performed due diligence in attempting to obtain verification and written certification that the applicant's statement was true and complete.
- ❑ Certification by the individual or head of household that no subsequent residence has been identified; **and**
- ❑ Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

## Homeless Verification

### CATEGORY 3

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless, but who meet the following four (4) criteria:

- ❑ Are defined as homeless under other legislation (see handbook for details)
- ❑ 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;
- ❑ Have experienced persistent instability as measured by 2 moves or more during the 60-day period immediately preceding the date of application; **AND**
- ❑ 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 General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.
- ❑ Will likely self-certify.

## Homeless Verification

### CATEGORY 4

Is fleeing, or is attempting to flee some form of family violence, has no other residence; **and** Lacks the resources or support networks, e.g., family, friends, faith based or other social networks, to obtain other permanent housing:

- ❑ Third party verification (law enforcement, referrals, etc.)
- ❑ The DCA Housing Status Self Certification Form documenting that applicant is fleeing a domestic violence situation, has not identified a subsequent residence, and lacks the resources or support networks, e.g., family, friends, faith-based, or other social networks, needed to obtain housing where his/her safety would not be jeopardized **and**
- ❑ Written observation by the intake worker, a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, or records contained in HMIS or comparable database.

## Eligibility Criteria

- ❑ Below 30% AMI
- ❑ Meets requirements for At Risk of Homelessness; or Category 2, 3, or 4 of Homeless definition
- ❑ CATEGORY 2 hotel stays (evidence they can't stay 14 days from application date)
- ❑ Eligibility must be re-assessed every 90 days and annually for those enrolled in the program 1 year after initial enrollment date

## Case Management Requirements

- At least 1X per month
- Changes in income/household composition
- Re-certification every 90 days (No advances)
- Re-cert annually
- Housing stability plan at discharge
- Increase incomes and acquisition of mainstream benefits (COMPASS)

## Property Related Items

1. Lease (in client name)
2. Rent reasonableness
3. Fair Market Rent (FMR) assessment
4. Habitability inspection
5. Lead based paint if: financial assistance and
  - Built before 1978
  - Child under 6 or pregnant woman
6. Rental assistance agreement

## Late Payment Fees

- ❑ Make timely payments to each owner in accordance with the rental assistance agreement
- ❑ Sub-recipient is responsible for paying late payment penalties that it incurs with non-ESG funds
- ❑ Arrears payments can be made up to 6 months rent, including late fees, and 6 months utilities, per service

## Use with Other Subsidies

- ❑ Collaborations with other programs are allowable if services are unduplicated (VASH, SSVF, etc.)
- ❑ Cannot receive same type of assistance from 2 public sources (federal, state, local, etc.)
- ❑ Rental assistance cannot be provided to a program participant who is receiving tenant-based or project-based rental assistance or URA
- ❑ Payment for client's part of rent arrears allowable (1 time)

## Performance Measures-Prevention

1. Increase in discharged households that maintained permanent housing at project exit.
2. Increase in discharged households remaining in permanent housing 3 months after exit.
3. Increase in households that acquire cash and non-cash income during project enrollment.

## Implementation Steps

1. Read manual and regulations
  - Homeless Definition Rule
  - Interim ESG Rule
  - DCA ESG Guidebook
2. Read your contracts!
3. Familiarize yourself with ESG Grantees Only website
4. Watch pre-recorded ESG webinars on HUD Exchange website
5. Incorporate Housing Support Standards into practice

## Implementation Steps

7. Establish relationships with landlords
8. Hire and train staff
9. Adopt intake, etc. forms from DCA website
10. Participate in 2016 ESG trainings
11. Establish partnerships with shelters, hotels/motels, service agencies, DoL, etc.
12. Master the FMR equation (page 21-22 of ESG Guidebook)

## Implementation Steps

13. Set up HMIS
14. Coordinate with your Prevention peers
  - DCA lists, webinars
15. Set staff and project goals for the year
16. “Screen in” for services
17. Make project participants' long term success your main goal

## Resources

- HMIS webinars, trainings and technical assistance throughout the year
- ESG webpage for sub-grantees
- Peer support
- HUD Exchange website:  
<https://www.hudexchange.info/>
- Reach out to DCA and HMIS staff for assistance please!

## Questions/ Thank You

- ESG workshop survey will go out-we need your feedback
- Thanks again!
- Questions?

