

Detroit Homeless Programs Rapid Re-Housing Policies and Procedures in Collaboration with the Detroit Continuum of Care Approved by the Detroit Continuum of Care Board February 5, 2018 Official Implementation Date May 1, 2018; CoC Board Approval 03/02/2020 Updated April 15, 2021

Rapid Re-Housing is an eligible activity for the Emergency Solutions Grant (ESG), its match program, Community Development Block Grant (CDBG), and the Continuum of Care (CoC) Program. In an effort to provide continuity of service to all being served in Rapid Re-Housing, the City of Detroit and the Detroit Continuum of Care have aligned programmatic requirements for services, except in cases where there are differences in the regulatory requirements. In these cases, the separate expectations are clearly noted. For additional information regarding the differences between CoC and ESG Rapid Re-Housing, please refer to the HUD published document, Rapid Re-Housing: ESG vs. CoC 2013. This resource is also referenced throughout the document.

Additionally, the policies and procedures outlined in this document refer to services provided under the CoC Rapid Re-Housing (RRH), ESG RRH program and CDBG Homeless Public Service match. All references to ESG standards and requirements as applies to CDBG as it provides the match for ESG. The expectations are the same regardless of the HUD funding source, unless otherwise noted.

Preface: Glossary of Terms Used in This Document Family/ Household

A family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, nearelderly person, or any other single person; or
- (2) A group of persons residing together, and such group includes, but is not limited to: (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family) 24 CFR 5.403.
- (3) Section 576.102(b) of the ESG interim rule prohibits ESG-funded programs from denying a family admission to an ESG-funded program or ESG-funded services based on the age of a child under the age of 18 if the program provides services to families with children. Similar requirements for CoC programs can be found in Section 578.93(e) of the CoC Program Interim Rule.

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 non metropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at: http://www.huduser.org/portal/datasets/fmr.html

Homeless Definitions for Populations Eligible for Rapid Re-Housing

Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i)An individual or family with 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) An individual or family living in a 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) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately

Category 4: Fleeing/Attempting to Flee Domestic Violence:

Any individual or family who:

- (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

before entering that institution.

(iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

Housing First

Housing First emerged as an alternative to the linear approach in which people experiencing homelessness were required to first participate in and graduate from short-term residential and treatment programs before obtaining permanent housing. In the linear approach, permanent housing was offered only after a person experiencing homelessness could demonstrate that they were "ready" for housing. By contrast, Housing First is premised on the following principles:

√ Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.

- ✓ All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period of time, while others may need more intensive and long-term supports.
- ✓ Everyone is "housing ready." Sobriety, compliance in treatment, or even criminal histories are not necessary to succeed in housing. Rather, homelessness programs and housing providers must be "consumer ready."
- ✓ Many people experience improvements in quality of life, in the areas of health, mental health, substance use, and employment, as a result of achieving housing.
- √ People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
- √ The exact configuration of housing and services depends upon the needs and preferences of the population.

Permanent Housing

Permanent housing means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid re-housing. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.

Rapid Re-Housing

One form of CoC and ESG-funded permanent housing consists of rental assistance and services. The provision of supportive services, as set forth in § 578.53 and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), 576.106, as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. While HUD limits rental assistance to 24 months, Detroit has set additional limits. Beginning January 1, 2020 all households entering a CoC or ESG RRH program will be limited to 12 months of financial assistance.

Rent Reasonableness and Fair Market Rent (FMR)

Rental assistance cannot be provided for a housing unit unless the total rent for the unit does not exceed the fair market rent (FMR) established by HUD, as provided under 24 CFR 982.503. The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. These rent restrictions are intended to ensure that program participants can remain in their housing after their assistance ends. In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another]. Other local resources may also be used to obtain information, such as market surveys, classified ads, and information from real estate agents. When comparing rent reasonableness, the proposed unit must be compared to three other units. One resource to use for determining rent reasonableness in Detroit is:

http://www.michiganhousinglocator.com/Portals/mshda/Default.aspx

Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes

rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, credit repair.

Note that this guidance only applies to ESG homeless prevention and rapid re-housing. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following <u>HUD</u> Exchange resource.

For more information about calculating rent reasonableness and FMR, please review this <u>HUD</u> Exchange Resource.

Section 1: Rapid Re-Housing Program Background

The US Department of Housing and Urban Development (HUD), via its Emergency Solutions Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules, requires that Continua of Care (CoC) establish and consistently follow written standards for providing CoC and ESG assistance. The Detroit Continuum of Care has developed Rapid Re-Housing Program Standards to help fulfill these requirements and to help move Detroit forward in achieving HUD's goal of reducing and ending homelessness across the United States. In addition to meeting federal requirements, these standards will also help ensure more consistent use of best practices and help to standardize program design and implementation of our Rapid Re-Housing projects across our homeless system. This policy and procedure manual is intended to further clarify and inform the service expectations outlined in the CoC written standards.

Section 2: Detroit Continuum of Care Rapid Re-Housing Program Overview

Rapid Re-Housing (RRH) is a short-term intervention to help individuals and families exit homelessness as quickly as possible, move into permanent housing, and achieve stability in housing. To be defined as Rapid Re-Housing, a project must be comprised of the following three core components: housing identification assistance, financial assistance, and case management and supportive services. ¹

High quality Rapid Re-Housing programs help increase the number of people communities are able to serve by reducing the length of shelter stays, which frees up crisis beds for others in need, reduces the negative impacts of long-term homelessness, and connects people to other community assistance to improve overall well-being and increase self-sufficiency.

Summary

Rapid Re-Housing programs are designed to help those who are experiencing homelessness transition into permanent housing. The primary goal is to stabilize a program participant in

¹ https://endhomelessness.org/rapid-re-housing-works/

permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Once a participant is enrolled, Rapid Re-Housing programs should rely heavily on a case management plan to ensure long term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants. Linkages should also be made to applicable mainstream programs such as SOAR, food stamps, TANF, and other programs as applicable. In most cases, households who have entered a Rapid Re-Housing program have applied for a Housing Choice Voucher. In such cases, ensuring the tenant obtains their vouchers and leases up a unit is of tantamount importance both for that tenant's long-term self-sufficiency and for those in shelter who would benefit from Rapid Re-Housing. This is a key part of the case management.

Applicability of Rapid Re-Housing Program Standards

Detroit's Rapid Re-Housing Standards outlined here apply to all Rapid Re-Housing projects funded through HUD's Continuum of Care (CoC) Program and City of Detroit Emergency Solutions Grant (ESG) or CDBG Homeless Public Service. Rapid Re-Housing program capacity directly reflects funding availability. Maintaining your program at full capacity helps the Detroit CoC maintain funding and potentially expand services and availability throughout the Continuum.

Rapid Re-Housing Provider Expectations Performance Benchmarks

In an effort to provide the highest quality of service and support to households in crisis the City of Detroit and Detroit CoC have designed the following benchmarks for success and programmatic monitoring for all ESG-funded RRH programs.

These benchmarks are expectations of rapid re-housing providers and will be integrated into ongoing programmatic monitoring:

- Rapid Re-Housing clients must move into housing within 60 days of program entry
- *Rapid Re-Housing staff will engage in case management services with clients at least every 30 days
- *Rapid Re-Housing participant home visits will be made at minimum once every 90 days;
- Percentage of client that exit to permanent housing destinations;
- Percentage of client who exit within 180 days; and
- The percentage of Rapid Re-Housing households that increase income from program entry to exit.

*During the COVID-19 pandemic, case management or home visits can be offered face-to-face or virtual but the type of interaction must be the decision of the client. Home visits to the extent possible should be in person to make sure the unit is in satisfactory condition. If services are to be provided virtually, the provider has the responsibility of ensuring the client has adequate access to the technology, i.e. internet. Resistance or lack of client engagement cannot be a reason for client termination. Providers must document all attempts to engage.

Expectations for Rapid Re-Housing Staff Training

In order to ensure high quality service provision for those receiving Rapid Re-Housing, agencies administering Rapid Re-Housing programs within the Detroit CoC will document Rapid Re-Housing staff participation in training and stay current on relevant topics including:

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First
- Motivational Interviewing
- Fair Housing/ Equal Access/ Housing Law
- Safety Protocol for serving clients in the community, including those fleeing domestic violence
- Clients' Rights/Grievance Process
- Trauma Informed Care

During the monitoring process, organizations will be asked to provide the detail of their annual staff training policy and protocol, as well as information on the on-boarding process for new employees.

We strongly encourage that organizations utilize any and all available training provided via the Continuum of Care to meet these training expectations.

The City of Detroit's Housing and Revitalization department has compiled a list of free training materials on some of the topics listed above. This resource also includes posttests that should be completed and kept in staff's file for auditing purposes. In addition, we strongly encourage organizations to utilize any and all available training provided via the Continuum of Care to meet these training expectations.

Housing First Philosophy

Housing First is an approach to homeless assistance that prioritizes rapid placement and stabilization in permanent housing without preconditions such as sobriety or a minimum income threshold and does not have service participation requirements beyond monthly case management. Projects using a housing first approach often have supportive services; however, participation in those services is based on the needs and desires of the program participant.

Rapid Re-Housing programs and services utilize a Housing First approach. Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

Client-Centered Service Philosophy

In order to ensure client satisfaction with services and maintained a client centered approach, all programs must demonstrate a survey process that allows the program to obtain and integrate client feedback into service provision on an annual basis.

Section 3: Determining Rapid Re-Housing Participant Eligibility Eligibility for Rapid Re-Housing Programs

- All households served by Rapid Re-Housing programming must meet either Category 1 or Category 4 definitions of homelessness at time of acceptance into program. Refer to the glossary of terms in the beginning of this document for additional guidance on the definitions.
- There is no income limitation for entry into Rapid Re-Housing program.

Exhibit 1: Eligibility Criteria Summary for ESG and CoC Rapid Re-Housing ²					
Criterion	Initial Evaluation			Re-Evaluation	
Criterion	ESG-RRH	CoC-RRH		ESG-RRH	CoC-RRH
Homeless Eligibility					
Literally homeless	✓	✓			
Imminent risk of homelessness (Not allowable in Detroit)		✓			
Homeless under other Federal statutes (Not allowable in Detroit)		√			
Fleeing/attempting to flee domestic violence	√ *	✓			
Income Evaluation Required				✓	
Need (amount and type of assistance)	✓	✓		✓	✓
Lacking Resources and Support Networks				✓	✓
* Eligible only if also literally homeless.					

Rapid Re-Housing Referral Process

Referrals

100% of all referrals must be provided through Detroit's Coordinated Assessment Model (CAM), per this policies and procedures manual.

Rapid Re-Housing Prioritization and Referral Process

Clients who are recommended for Rapid Rehousing are prioritized first by acuity group, and then according to the following factors:

- 1. Clients who are chronically homeless
- 2.Clients who are unsheltered
- 3. Clients who are fleeing domestic violence
- 4. Clients with the highest VI-SPDAT score

² https://files.hudexchange.info/resources/documents/Rapid Re-Housing ESG vs CoC.pdf

When there are multiple clients with the same score after the above criteria are followed and not enough RRH resources available for all of them, clients will be prioritized in the following order:

- a. Family status
 - 1.Families
 - 2. Singles Adults
- b. Length of time homeless
 - 1.Longest length of time homeless to shortest length of time

The prioritization factors are subject to change according to community need. Any changes to prioritization factors will be communicated by the Homeless Action Network of Detroit and will be included in the Manual's annual updates.

See Addendum A for details on acuity groups and prioritization factors.

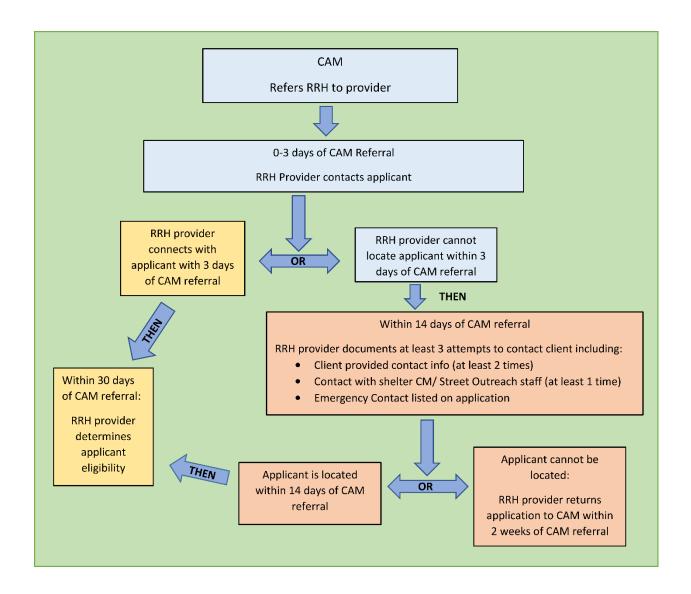
Housing Choice Voucher (HCV) -Security Deposit Only

Participants seeking assistance with Security Deposit Only may be eligible for financial assistance without prioritization or waitlist placement. Applications for Security Deposit Only may be assisted at any time if program funds are available. Rapid Re-Housing providers should assess the financial status of Security Deposit Only referrals to determine if there is a demonstrated need for this assistance prior to providing the service.

Referral to Rapid Re-Housing Providers

Referrals are driven by program capacity. As soon as a provider is aware of an opening, they can request a referral from the CAM. Clients will be referred at a ratio of 1 applicant:1 available Rapid Re-Housing opening.

Once a referral is made, the Rapid Re-Housing providers will maintain the following schedule:



Note: For applicants that cannot be located within 14 days, CAM will return the client referral to inactive list for possible referral at a later date. Returns are sent to the inactive list by providers by marking the client as "declined" (if client was ineligible or refused the project) or "cancelled" (if client was unable to be contacted) in HMIS and noting the specific reason the referral was declined or cancelled. In cases where referrals are returned, attempts at contact should be clearly documented in HMIS.

Clients may remain on the Rapid Re-Housing inactive waitlist for up to three months, with the opportunity to be reactivated if they reappear. However, reactivated clients will not move directly to the top of this list. Instead, the client referral to services would be reordered based on their prioritization scores.

Documentation of Eligibility

Clients can be referred via CAM regardless of whether they have all required documentation at time of referral. The only required referral document is verification of homelessness, which should be uploaded into the client's HMIS record. If a household is being referred to a RRH program specifically funded to serve persons fleeing domestic violence, documentation of the person's fleeing/attempting to flee domestic violence must be obtained.

 Upon first contact, Rapid Re-Housing provider will utilize HMIS data to verify client is still experiencing homelessness. If HMIS data is unavailable, client is to complete a self-statement of homelessness prior to eligibility determination.

Please note that lack of personal verification documentation shall not prevent entry into the Rapid Re-Housing program. However, it is the expectation of the program providing services to secure third party verification of identity as soon as possible and should be in the client file at time of exit. Timeliness is important because if a client is pulled for any subsidy, it is expected that a household have current identification and other personal verification documents.

The following documents should be collected or obtained when possible:

- Photo identification for Head of Household and all household members age 18 and over. This can be a federal, state or municipally issued form of picture ID.
- Birth Certificates for all children in household- Medicaid card can substitute
- Social Security Cards

If any of the above documents are missing during housing search and placement process, case management should still move forward. Case managers should complete Form 16: Missing Documentation Form. This form provides the opportunity for self-certification of identity. As soon as possible all missing documents are expected to be obtained with support from the case manager.

• Veterans- if eligible for Veteran Services, the CAM will refer to SSVF. If not eligible for Veteran Services- the CAM will follow established prioritization for Rapid Re-Housing.

Rapid Re-Housing Programs Referral Refusals

The following guidance outlines the reasons that a referral can be refused by a Rapid Re-Housing service organization:

- There have been past documented incidents working with the client where there was potential harm to the RRH service provider during their time in RRH or if the client was at risk of harming themselves.
- The client was already housed when contacted by the provider.
- The provider was unable to contact the client after three documented attempts (one of which was via the Navigator).
- The client declines working with the agency or the client declines the unit(s).
- Client was institutionalized at the time contacted by the provider and will not be released within the next 90 days.
- If there are other extenuating circumstances, providers should reach out to their City of Detroit grant manager and/or HAND via email to request approval to refuse a referral.

• If a conflict of interest between staff and referral, every effort should be may to reassign the referral to a non- conflict staff person.

Rapid Re-Housing Program Transfers

Rapid Re-Housing Standard: Beginning in January 2020, agencies will no longer be allowed to transfer clients into City of Detroit Rapid Re-Housing programs with the following exceptions:

- Transfers from MSHDA ESG
- RRH programs that are closing are exempt and therefore are allowed to transfer clients into another City of Detroit RRH program.

Transfers *into* a CoC RRH program from a City or MSHDA ESG RRH program may be allowable, depending upon the funding source of the program the client is being transferred from. Providers that want to explore transferring a client into a CoC RRH program should first consult with HAND to explore feasibility of doing so before pursuing the next steps given below.

Program participant initiated transfer requests will undergo processes as outlined below.

Additional transfer guidance is as follows:

All transfer requests will be reviewed by the Detroit CoC Rapid Re-Housing Committee. Transfers into either a CoC or ESG funded RRH will be granted on an individual case basis. Transfers will be considered for the following circumstances:

- Closure of participant's current Rapid Re-Housing Program/provider due to loss of grant dollars (MSHDA, ESG or CoC-funded) prior to household completion of the program.
- Program does not have the financial resources to meet the client's needs (MSHDA RRH programs only).

The following documentation must be used in the transfer process:

- Must use City of Detroit Rapid Re-Housing transfer form
- Move in date must be tracked in HMIS
- Transfer form must be uploaded into client's HMIS record
- Client must recertify for assistance within 5 business days of transfer regardless of recertification due date

Rapid Re-Housing Referral and HMIS

Definition of terms in HMIS:

- Accepted-Client referral accepted (Intake appointment scheduled)
- Declined- Client referral declined due to ineligibility, client refusal reason for decline must be provided.
- Cancelled- Client was unable to be contacted/ No show for intake appointment (per contact parameter outlined in this document)

Post Referral HMIS Workflow

Below are the expectations for documentation in HMIS after a referral has been requested from CAM:

- 1. Run HMIS referral report for the current referral period
- 2. Compare HMIS referral report to referral confirmation e-mail received from CAM
 - a. If any discrepancies exist, contact CAM immediately to inform
- 3. Attempt to contact client within 3 days upon receipt of referral, and document attempts to contact in the "Case Notes" section of the summary page
 - a. At least 2 documented contacts to the contact info provided by client
 - b. At least 1 documented contact to the shelter CM/street outreach provider
 - c. If applicable, at least 1 documented contact to any other contact listed for client in HMIS
- 4. Once contact with client is made, schedule intake with client and complete the referral outcome as "accepted" in HMIS.
- 5. If client unable to be contacted after the 3 documented attempts, complete the referral outcome as "cancelled" in HMIS. CAM will run a referral report to note any cancelled referrals, check for documented attempts at contact, and move client to inactive if attempts at contact have been sufficiently made.
- 6. Upon intake with client, complete a Program Entry in your specific program bin. All clients with accepted referrals should have a Program Entry (noting intake has taken place) within 30 days of referral being made.
 - a. If client is found to be ineligible or refuses services at the point of intake:
 - i. Complete the referral outcome as "declined" in HMIS
 - ii. Complete an entry in the "RRH Outcomes/Client Status" sub-assessment on the summary page with the following information:
 - 1. RRH Client Status: Client denied for RRH
 - 2. If Denied-Reason: Select the reason for denial
- 7. Once intake has been completed and client is enrolled in program, select "yes" next to "client currently in RRH program?" and complete an entry in the "RRH Outcomes/Client Status" sub-assessment on the summary page with the appropriate information reflecting the status of the case.
- 8. While working with client toward housing (after client enrolled in program):
 - a. Document all case notes in the "Goals" section of HMIS under the "Case Plans" tab.
 - b. Complete an entry in the "RRH Outcomes/Client Status" sub-assessment on the summary page once per month or as client status changes.

Section 4: Post-Referral Service Provision and Placement

RRH Client Time Limit

As of January 1, 2020 all <u>new clients entering a City of Detroit or CoC RRH program will have the following time limits:</u>

• Limited to 3 months of Housing Search and Placement services (ESG only)

For instance, if a client has an HMIS entry date of 1/1/2020, they must obtain permanent housing prior to 04/01/2020. If additional time is needed, the provider must bring the client case to the RRH Workgroup meeting to review the case and receive peer feedback in an effort to assist with housing placement as well as informing the City of Detroit HRD Homeless Solutions division or HAND, dependent upon funding.



Time Limits on RRH Rental Assistance

The amount of time a household may receive RRH rental assistance depends upon the RRH project that household is enrolled in and the funding source for that project. Please see Addendum C for the current limits on how long a household may receive RRH rental assistance. *NOTE: It is the responsibility of the RRH to understand which funding source their RRH project(s) receive and which project a household is enrolled in.*

Use of Standardized Rapid Re-Housing Forms

In order to ensure continuity across programs and providers, Rapid Re-Housing providers receiving CoC or City of Detroit ESG funds are expected to use the program forms provided in the Addendum B. Although forms can be personalized to include the organization logo, the content should remain the same.

Client File Maintenance

Case Notes and Client Contact Requirements.

All Rapid Re-Housing and Sustainability Coordination activities will be documented in case notes in the HMIS client case file. Case notes will include at minimum:

- Date, location, purpose of the activity;
- Progress on housing goals;
- Documentation of appointments, meetings, home visits, phone calls, letters with members of the household, landlord and other service providers;
- For contacts with anyone other than a member of the household, a signed release of information must be included in the case file indicating consent for exchange of information;
- Referrals made, including date of referral, name of referral and reason for referral;
- Documentation of minimum monthly contact with the household;
- Indication that the housing service plan has been reviewed and updated a minimum of once per month; and
- Documentation of activities related to program exit.

Required Verifications

Rapid Re-Housing Coordinators are required to verify identity and income of program participants at the time of intake.

Copies of the following verifications are to be included in the case file:

- To verify identify:
 - Proof of social security numbers and documentation of birth dates for all household members
 - Current Government issued photo identification card for all adult household members
 - Birth Certificates for children
- For income verification, any or all of the following as applicable:
 - Most recent paystubs
 - Employment verification if unable to obtain paystubs
 - DHHS award letters for food stamps, MI Bridges printout, or TANF
 - SSI/SSDI or Unemployment compensation
 - Child support
 - Other sources of income, W-, 1040

If at entry identity verification documents are not all available, a self-certification of identity must be included in the file. All identity documents should be place in the file when obtained. Reminder, lack of identification should never be a barrier to program entry.

- Required Releases of Information and Agreements
 - Housing Service Plan;
 - HMIS Client Consent (enter information into HMIS & share with agencies);
 - Agency Client Release of Information;
 - Lease once housed, a copy of the household's signed lease will be included in the file;
 - Proof of rent reasonableness;
 - Notice of Occupancy Rights;
 - Duplication of Benefits form; and
 - Lead notification if applicable

Housing Placement Guidance and Documentation Requirements

 Rapid Re-Housing providers may pay 100% the first three month's rent regardless of household income (prorated rent counts as the first month's rent) Changed from agency paying first month to now allowing agency's to pay the first three month's rent.

- Beginning month four-tenant pays 30% of adjusted income, through to the termination of Rapid Re-Housing programmatic rental assistance.
- If a client loses income, staff must complete a new income recertification and adjust the tenant rental responsibilities. This is not a requirement if income increases unless they were previously at zero income.
- Case Manager conducts first home visit with Rapid Re-Housing client within 30 days of moving into housing.
- Housing Quality Standards (HQS) inspections will be completed by a housing inspector who
 is not the assigned case manager. HQS will be completed within 7 days of the unit becoming
 available for inspection. HQS Inspection form
- Rapid Re-Housing providers will track available units, landlords and vacancies to reduce housing search time.
- Lead Paint notification is provided by Rapid Re-Housing provider at time of intake. <u>Lead</u>
 Based Paint Info
- 100% of Rapid Re-Housing participants sign a lease agreement with a private landlord
- 100% of participating property owners will enter into Rental Assistance Agreement (Form #21)
- Landlord agrees to enter into Rental Assistance Agreement every 90 days (upon client recert)
- Tenants will pay their portion of the rental amount directly to the property owner.

CHANGE

Supportive Services

Standard: Rapid Re-Housing programs should not exceed a client household ratio of 1:25. Budgets should reflect appropriate staffing to match these case management ratios and ensure an adequate level of service for households being served in Rapid Re-Housing.

- Rapid Re-Housing programs require case management with Rapid Re-Housing clients every 30 days
 - At minimum, a home visit should be completed every 90 days
 - Engagement in services is voluntary (if clients refuse monthly case management, efforts must still be documented)
 - All attempted contacts should be documented in HMIS
 - Providers should utilize progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals.
- Initial housing plan will be drafted with client at project entry.
 - Housing plans will be updated within 30 days of moving into housing.
- The role of Rapid Re-Housing staff in case management services is as follows:
 - Be an active partner in housing search, providing the level of support necessary to help participant household obtain housing.
 - Understand and help remove barriers to housing
 - Removing barriers to housing
 - Design a housing plan
 - Meet with tenant least once per month
 - Complete home visits at least every 90 days
 - Connect to mainstream resources
 - Employment support
 - Review and update housing plan monthly
 - Connect clients with subsidized housing as appropriate including housing choice and other voucher programs
 - Recertify clients for housing choice vouchers, assist with completing briefing packets, identify other housing units if applicable, and lease up with voucher
- If the Tenant is facing a threat of eviction, the agency should create a Landlord Mediation Plan/Stabilization plan to prevent eviction.
- Income certification should be done on an annual basis based on their date of program entry or if the client loses income.

Exhibit 2: Supportive Services Overview ³			
	ESG-RRH	CoC-RRH	
Services	Supportive services are limited to housing relocation and stabilization services.	Supportive services include a wide range of services outlined in 24 CFR part 578.53.	
Housing stability case management assistance may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the program participant is living in permanent housing.		Supportive services may be provided until 6 months after rental assistance stops.	
Case Management Requirement	At a minimum, program participants must attend monthly case management meetings.	At a minimum, program participants must attend monthly case management meetings.	

³ https://files.hudexchange.info/resources/documents/Rapid Re-Housing ESG vs CoC.pdf

Exhibit 3⁴ provides a summary of eligible supportive services under ESG and CoC RRH. While CoC funding may be used to fund all CoC supportive services listed in 24 CFR part 578.53, the Detroit CoC has developed written policies and procedures outlining what services are available to program participants in order to align CoC-funded RRH programs with ESG-funded RRH programs.

	Exhibit 3: Summary of Eligible RRH Supportive Services			
	ESG-RRH 24 CFR part 576.10	CoC-RRH 24 CFR part 578.53		
Housing Services & Related Services	Assist participants in locating, obtaining, and retaining suitable permanent housing, including: Housing search Tenant counseling Understanding leases Arranging for utilities Making moving arrangements Assessment of housing barriers, needs, and preferences Development of an action plan for locating housing Outreach to and negotiation with owners Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness Assistance with submitting rental applications	Assist participants in locating, obtaining, and retaining suitable housing, including: Housing search Tenant counseling Understanding leases Arranging for utilities Making moving arrangements Mediation with property owners and landlords Credit counseling, accessing a free personal credit report, and resolving personal credit issues Payment of rental application fees		
Case Management Services	Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing by, for example: Conducting the initial evaluation, including verifying and documenting eligibility Using the centralized or coordinated assessment system Counseling Developing, securing, and coordinating services Obtaining Federal, State, and local benefits Monitoring and evaluating program participant progress Providing information and referrals to other providers Developing an individualized housing and service plan, including planning a path to permanent housing stability Conducting re-evaluations	Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participant(s), including: Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking Using the centralized or coordinated assessment system Counseling Developing, securing, and coordinating services Obtaining Federal, State, and local benefits Monitoring and evaluating program participant progress Providing information and referrals to other providers Developing an individualized housing and service plan, including planning a path to permanent housing stability Conducting required annual assessment of service needs (re- evaluation)		

⁴ https://files.hudexchange.info/resources/documents/Rapid Re-Housing ESG vs CoC.pdf

	Exhibit 3: Summary of Eligible RRH Supportive Services			
	ESG-RRH 24 CFR part 576.10	CoC-RRH 24 CFR part 578.53		
Legal Services	Costs of resolving a legal problem that prohibits a program participant from obtaining or retaining permanent housing. Legal services or activities include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions: (a) Eligible Billing Arrangements. ESG funds may be used only for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys. Costs may be based on: Hourly fees Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees (b) Ineligible Billing Arrangements. Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements. (c) Eligible Subject Matters. Landlord/tenant matters; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants. (d) Ineligible Subject Matter. Legal services related to immigration and citizenship matters or related to mortgages.	Costs of legal advice and representation in matters that interfere with the homeless individual's or family's ability to obtain and retain housing. Legal services or activities include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions: (a) Eligible Billing Arrangements. CoC funds may be used for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys. Costs may be based on: Hourly fees Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees (b) Ineligible Billing Arrangements. Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements. (c) Eligible Subject Matters. Landlord tenant disputes; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants. (d) Ineligible Subject Matter. Legal services related to immigration and citizenship matters or related to mortgages and homeownership.		
Moving Costs	Costs such as truck rental or hiring a moving company, including payment of temporary storage fees for up to 3 months	Reasonable one-time moving costs, including truck rental and hiring a moving company		
Utility Deposits	Standard utility deposit that the utility company requires of all customers	Payment of utility deposit, which constitutes a one-time fee paid to utility companies		

	Exhibit 3: Summary of Eligible RRH Supportive Services			
	ESG-RRH	CoC-RRH		
	24 CFR part 576.10	24 CFR part 578.53		
Mediati	Mediation between the program participant and the owner or person(s) with whom the participant is living	Mediation with property owners and landlords on behalf of eligible program participants		
Credit	 Credit counseling Accessing a free personal credit report Resolving personal credit problems Other services needed to assist with critical skills related to household budgeting and money management 	Credit counseling Accessing a free personal credit report Resolving personal credit issues		

Additional Supportive Services Eligible under CoC-RRH ONLY

Child Care

The costs of establishing and operating child care and providing child care vouchers for children from families experiencing homelessness

Education Services

The costs of improving knowledge and basic educational skills

Employment Assistance and Job Training

The costs of establishing and operating employment assistance and job training programs

Food

The cost of providing program participants with meals or groceries

Life Skills Training

The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness but that are necessary to function independently in the communityy

Mental Health Services

The direct outpatient treatment of mental health conditions by licensed professionals

Outpatient Health Services

The direct outpatient treatment of medical conditions by licensed medical professionals

Outreach Services

Activities to engage persons for the purpose of providing immediate support and intervention and for identifying potential program participants

Substance Abuse Treatment Services

The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing

Transportation

Costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other eligible services

Re-Evaluation

- Income Evaluation, All Programs (CoC and City of Detroit): Income evaluation should only be conducted if a household loses income or at the annual recertification based on their program entry date.

 No longer required to do
 - City of Detroit ONLY: If at the recertification it is found that a household if over 30% AMI, the program must terminate rental assistance as of the beginning of the next rental period. For income eligibility see the following link: HUD Income Eligibility Calculator.">HUD Income Eligibility Calculator.
- Need (amount and type of assistance): Rapid Re-Housing program must determine the amount and type of assistance that the program participant/ household will need to (re)gain stability in permanent housing.
- Lacking Resources and Support Networks- Rapid Re-Housing program participant should assess for a continued lack of sufficient resources and support networks to maintain housing without ESG or CoC program assistance.

Rapid Re-Housing Program Termination and Opportunity for Appeal

It is important that Rapid Re-Housing providers effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time. Additionally, all City of Detroit/ CoC funded Rapid Re-Housing program agencies must include termination policies and procedures in their agency regulations and manuals. CoC RRH programs must ensure their termination policy is in compliance with the regulations at 24 CFR 578.91. If a participant violates ESG program requirements, the subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

To ensure effective communication for both Rapid Re-Housing agencies and participants, the Detroit CoC requires the following actions prior to program termination:

- At least one face to face meeting with the Rapid Re-Housing participating household discussing program violations;
- A written plan for rectifying program violations including action steps for both Rapid Re-Housing agency staff and program participants;
- If termination is due to an inability to contact the client, the following must be documented in the file:

An attempted home visit

and

A letter to client and landlord notifying the intent to terminate rental assistance

In any situation, case notes should demonstrate documented efforts made to contact and connect with client.

Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual as long as they have not reached the

maximum amount of assistance. Those seeking further assistance must be homeless and referred through the CAM system as outlined on page 7.

Guidelines for Providing Financial Assistance

Allowable Costs

ESG and CoC rapid re-housing grant funds may be used to provide short- and/or medium-term rental assistance and accompanying, limited supportive services, as needed, to help an individual or family that is homeless move as quickly as possible into permanent housing and achieve stability in that housing. Exhibit 4 provides a summary of eligible costs under ESG-RRH and CoC-RRH.

Exhibit 4: Eligible Costs Summary ⁵				
	ESG-RRH	CoC-RRH		
Rental Assistance	Short-term rental assistance (up to 3 months) Medium-term rental assistance (4 to 24 months) (Detroit limit of 12 months after 1/1/20) Rental arrears (one-time payment of up to 6	 Short-term rental assistance (up to 3 months) *Medium-term rental assistance (4 to 24 months) (Detroit limit of 12 months after 1/1/20) 		
4	months of rent in arrears, including any late fees on those arrears)	Topogé boood routel position of only		
Rental Assistance Type	Project-based rental assistance Project-based rental assistance	Tenant-based rental assistance only		
	Housing Relocation and Stabilization Services	Financial assistance (eligible under rental assistance)		
		Security deposits (up to 1.5 months)		
	Financial assistance costs	First and last month's rent		
	Rental application fees	Property damage U		
	Security deposits (up to 1.5 months)	Utility reimbursements and staffing costs		
	Last month's rent	associated with administering those funds		
'	Utility deposits and payments (up to 24	Supportive services		
<u>e</u>	months, including up to 6 months for payments in arrears, max \$2,500)	Case management		
Eligible	Moving costs	· Child care		
<u> </u>	g scots	Education services		
	Service costs	Employment assistance and job training		
	Housing search and placement	Food		
	Housing stability case management Mediation	 Housing search and counseling services, including mediation, credit repair, and payment of rental application fee 		
	Legal services	Legal services		
	Credit repair	Life skills training		
		Mental health services		
		Moving costs		
		Outpatient health services		
		Outreach services		
		Substance abuse treatment services		
		Transportation		
		Utility deposits		

⁵ https://files.hudexchange.info/resources/documents/Rapid Re-Housing ESG vs CoC.pdf

Maximum Rental Assistance Allowed

Subsidy Layering-City of Detroit will review subsidy layering within Rapid Re-Housing to ensure layered funding is in accordance with ESG standards. Approval from City of Detroit ESG contract manager will be required in writing to provide RRH assistance to a household that already receives any other federal housing subsidy.

HUD/Federal/State Rules

All projects must comply with the <u>Fair Housing Act</u> (including <u>Equal Access and Family Separation</u>), the <u>Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity</u> regulations, and the <u>Americans with Disabilities Act</u> regulations. Refer to the City of Detroit Homeless Programs Policy and Procedure Manual or the links provided in this document for more information. All providers should establish organizational policies to ensure that all federal laws are followed in the administration of Rapid Re-Housing Services.

Other HUD Requirements

All funded projects are expected to be familiar with and adhere to all HUD requirements including the ESG and CoC Program Interim Rules, applicable Notices, and CoC Program NOFA(s) under which the project is funded. This includes, but is not limited to:

- Participant eligibility
- Prioritization
- Allowable activities and costs
- Site control
- Subsidy layering
- o Environmental review
- Matching requirements.
- Calculating occupancy charges and rent.
- Limitations on transitional housing.
- o Term of commitment, repayment of grants, and prevention of undue benefits.
- Displacement, relocation, and acquisition.
- Timeliness standards.
- Limitation on use of funds.
- Limitation on use of grant funds to serve persons defined as homeless under other federal laws. Termination of assistance to program participants.
- o Fair Housing and Equal Opportunity.
- Conflicts of interest.
- Program income.
- Recordkeeping requirements.
- Grant and project changes
- Other applicable federal requirements as outlined in the regulations

HMIS Compliance for Rapid Re-Housing

In addition to the post referral workflow outlined in Section 3, Rapid Re-Housing providers will be expected to complete data entry within 48 hours, and to follow all other data standards outlined by HUD and the Detroit Continuum of Care. RRH providers are expected to comply with the CoC HMIS Policies and Procedures and the current version of the HUD ESG programs HMIS Manual. The HUD ESG Manual outlines the required Universal Data Elements (UDEs) for all ESG program types.

The following data elements and components are mandatory for Rapid Re Housing:

- Housing Match Assessment
- Project Start Date
- •Housing Move -In Date (recorded in the Interim Assessment Module)
- •Interim Assessment (Move -In Date, Quarterly & Annual Review tracking)
- Prior Living Situation
- •Rapid Re-Housing Service Transactions Module (tracking HRSS & Rental Assistance services)
- •Initial Referral Outcomes (tracking referral status Accept, Decline, Cancel)
- •Rapid Re-Housing Client Status (on Housing Match Assessment tracking activity between referral & housing)
- •HMIS Goals/Case Plan
- Client Contact/Case Notes

Please also refer to the CoC HMIS Policies and Procedures to make sure you are in compliance with system security, training, licensing, data quality and any other required elements for participating in HMIS. This includes the designation of an Agency Administrator who is responsible for monitoring users and data on a client & agency level as well as reporting

Specific Requirements for ESG subrecipients

City of Detroit Reimbursement Expectations for Subrecipients

The City of Detroit is committed to meeting to HUD spending guidelines for ESG. Rapid Re-Housing Programs must submit monthly reimbursement requests by the 15th day of each month to their designated grant manager. Subrecipients should submit one paper copy of the reimbursement request. Failure to submit timely requests for reimbursement can result in reallocations, reductions in awards or loss of future program funding. For further information on required documents for reimbursement, please consult the general section of the City of Detroit Homeless Program Policy and Procedure Manual.

City of Detroit Rapid Re-Housing Match Expectations

The City of Detroit demonstrates its ESG match commitment through the Homeless Public Service allocation it commits to ESG subrecipients. ESG subrecipients must use eligible funds to make up any allocation gap between ESG and CDBG.

Documentation of source of match is requested prior to contract execution and demonstration of match expenditure is required to receive the last ESG payment in each award (see the addendum for a blank copy of the form that must be submitted. This match must be expended on ESG-eligible activities. Matching sources may include cash contributions expended for allowable expenses and non-cash contributions including, but not limited to, the value of any real property, equipment, goods, or services committed to support ESG-eligible activities during the period of the ESG subrecipient agreement (see the above *Federal Requirements* section of the Homeless Program Policy and Procedure Manual and/or 24 CFR 576.201 for more information).

Addendum A

Coordinated Assessment Model Prioritization Process

Approved by the Detroit Continuum of Care Board February 3, 2020 Official Implementation Date May 1, 2018

Prioritization

The CAM utilizes prioritization throughout the entire process to allocate and match consumers in need of homeless assistance with the appropriate referral.

The CAM does not discriminate during the prioritization process based on data collected from the assessment process (for protected classes). Determining eligibility is different from determining prioritization. With the exception of a few unique projects, all PSH and RRH projects in the CAM utilize HUD's minimum criteria for entry into the project. Therefore, consumers are referred to appropriate housing resources using only the prioritization factors described in detail below. Any additional information gathered during the assessment process is not factored into the prioritization and referral process.

The CAM will, to the greatest extent feasible, prioritize available assistance for persons with the greatest service needs and levels of vulnerability before those with less severe needs and lower levels of vulnerability.

Consumers' vulnerability assessment scores and chronic status are used to make a housing intervention recommendation according to acuity level.

Because the CoC prioritizes housing resources for people who are chronically homeless first, staff at Access Points make a preliminary determination (based on HMIS activity and disclosure of a disability) of whether or not a person is chronically homeless before connecting them with CAM Navigation staff. When a CAM Navigator meets with a consumer to conduct the Full SPDAT, they also conduct a housing history interview to determine potential chronic status for the purposes of acuity grouping.

VI – SPDAT Recommendations			
	Single Family		
0-5	Acuity Group 4 – Mainstream Resources Only	0-5	Acuity Group 4 – Mainstream Resources Only
6-7	Acuity Group 3 - Recommended for RRH or TH-complete HCV pre-application	6-8	Acuity Group 3 - Recommended for RRH or TH-complete HCV pre-application
8+	Complete Full SPDAT to determine acuity group and housing intervention	9+	Complete Full SPDAT to determine acuity group and housing intervention

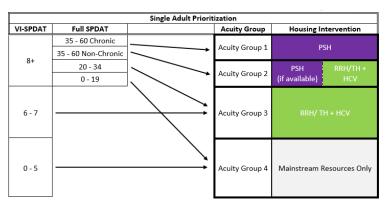
Full SPDAT Recommendations				
	Single	Family		
0-19	Acuity Group 4 – Mainstream Resources Only	0-26	Acuity Group 4 – Mainstream Resources Only	
20-34	Acuity Group 3 - Recommended for RRH or TH-complete HCV pre-application	27-53	Acuity Group 3 - Recommended for RRH or TH-complete HCV pre-application	
35-60 Non- Chronic	Acuity Group 2 – Recommended for either PSH, <i>or</i> RRH or TH, and HVC	54-80 Non-Chronic	Acuity Group 2 – Recommended for either PSH, <i>or</i> RRH or TH, and HVC	
35-60 Chronic	Acuity Group 1 – Recommended for PSH	54-80 Chronic	Acuity Group 1 – Recommended for PSH	

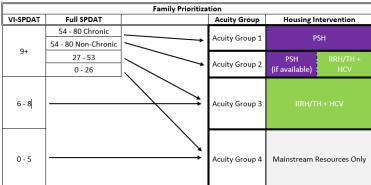
Consumers in Acuity Group 4 are recommended for mainstream resources only and will not be considered for CoC funded housing assistance. Shelter case managers assist this population in developing strategies to resolve their homelessness.

Consumers in Acuity Group 3 are recommended for RRH or TH as well as an HCV. CAM Navigators meet with consumers in this group to complete and HCV pre-application.

Consumers in Acuity Group 2 are recommended for PSH or RRH or TH, and HCV based upon resource availability. The CAM Lead Agency is responsible for determining what intervention/s households in Acuity Group 2 are navigated for based on analysis of resource supply.

See the charts below for a visual representation of the housing intervention recommendation process.





Available housing assistance is prioritized sequentially by acuity group, and then within acuity group according to the following order:

CAM Housing Resource Prioritization Order

Each of these prioritizing factors will be applied in sequential order. When there are insufficient resources to serve all of the households within a given category, then the next factor in the list will be considered.

- 1. Chronic Households
- 2. Unsheltered Households
- 3. Households Fleeing Domestic Violence
- 4. VI-SPDAT and/or SPDAT Score
- 5. Families then singles (*when the vacancy can be flexibly used for either population)
- 6. Length of time homeless

Prioritization is used to determine which household will be referred for the next available resource that they are eligible for. Households will not be prioritized for assistance that they are not eligible even if they are higher on the list. For example, if a project serves only youth age 18-24 then someone older than 24 will not be referred even if they are highest on the prioritization list. It is important to note specifically that chronic households will not be prioritized for Transitional Housing.

Addendum B Rapid Re-Housing Forms

All RRH forms can be found on HAND website.

Form No. 1 – Program Transfer Request Form

Form No. 2 – HUD's Definition of Homelessness and Certification

Form No. 3 – Housing Plan

Form No. 4 – Verification of Zero Household Income

Form No. 5 – Verification of Earnings

Form No. 6 – Household, Income, Asset, and Expense Declaration Form

Form No. 7 – Request for Lease Approval

Form No. 8 – HQS Inspection

Form No. 9 – Inspection Deficiencies Notice

Form No. 10 – Delayed Exterior Repair

Form No. 11 – Owner Certification – Lead Paint

Form No. 12 - Summary Notice of Lead-Based Paint Risk Assessment

Form No. 13 – Disclosure of Information on Lead–Based Paint and Its Hazards

Form No. 15 – Recertification Form

Form No. 16 – Missing Documentation Form

Form No. 17 – Client Services Extension Request Form

Form No. 21- Rental Assistance Agreement

Forms 18-20 are no longer in use. All MSHDA ESG forms can be found here.

Addendum C: RRH Rental Assistance Time Limits

Effective as of January 1, 2021

RRH Project Funding Source	Time Period of Funding Source	Maximum Months of Rental Assistance Household May Receive
CoC – without waiver	Depends on individual grant agreement with HUD	Up to 24 months
CoC – with waiver	Depends on individual grant agreement with HUD	Unlimited, until the public health crisis passes
Annual City ESG	*1/1/2010-12/31/2020	Up to 24 months
City ESG-CV Round 1	*1/1/2010-12/31/2020	Up to 24 months
City ESG-CV Round 2	*1/1/2010-06/30/2020	Up to 12 months
Annual MSHDA ESG	10/1/2020 — 9/30/2021	Up to 9 months
MSHDA ESG-CV Round 1	3/1/2020 — 9/30/2022	Up to 9 months

^{*}Dates may vary slightly. City subrecipients must adhere to the dates in their current contract.