

Montgomery County Homeless Crisis Response Program Manual

I. Target Population

Homeless Crisis Response Program (HCRP) is intended to serve individuals or families who are currently homeless and have no appropriate subsequent housing options and lack the financial resources and support networks needed to obtain immediate housing. This includes households fleeing from Domestic Violence.

The intent of Rapid Re-housing assistance is to provide rental and move-in assistance to enable the quick resolution of the immediate housing crisis. Rapid re-housing participants will be able to maintain housing with short (1-3 months) to moderate (4-24 months) assistance. Programs should assume households, even with zero income or other barriers, will succeed in housing with the right supports. Households with higher housing barriers or no income may need assistance for different depths or durations, but such households should still be assisted in immediately attaining permanent housing and increasing income to pay fair market rent.

In certain circumstances a household may “score” for Permanent Supportive Housing and will be “bridged” with HCRP Rapid Re-housing funds. The reason for a bridge may include the size of family, no current scattered site PSH vouchers, struggling in a communal shelter environment, etc. The household must already be on the Permanent Supportive Housing list and concertation with Homeless Solutions Staff should occur prior to assistance. Because Rapid Re-housing is not a long term subsidy, being identified as a bridge prior to Rapid Rehousing placement is imperative.

II. HCRP Application

The Montgomery County Front Door Assessment (FDA) and HCRP Rapid Re-housing application must be completed by a case manager for Rapid Re-housing (*See HCRP Application*). This FDA evaluates the client's barriers to housing and provides an outline for an individualized housing services plan. An HMIS Consent Form (*See HMIS Release of Information*) is signed by the household so client data can be entered into HMIS and required information can be collected. Any additional documents that are needed to complete the application/assessment process are checked off (*See Client Documentation Check List*) and given to the client to return to the case manager within three business days.

III. Household Eligibility

To be eligible to receive **HCRP Rapid Re-Housing** funds the individual or family must meet the HUD homeless definition and locally identified risk factors.

HCRP Household Eligibility

HCRP Rapid Re-housing Homeless	
Category 1- Literally Homeless OR	An individual or family who lacks a fixed, regular, and adequate nighttime residence, which includes a primary nighttime residence of: *Place not designed for ordinarily used as a regular sleeping accommodation (including car, park, abandoned building, bus/train station, airport, or camping ground. *Publically or privately operated shelter or transitional housing, including a hotel or motel paid for by government or charitable organizations; In addition, a person is considered homeless if he/she is being discharged from an institution where he or she has been a resident for 90 days or less and the person resided in a shelter (not

Montgomery County Homeless Crisis Response Program Manual

	transitional housing) or place not meant for human habitation immediately prior to entering that institution.
Category 4- Fleeing/Attempting to Flee DV	Any individual or family who: *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; *Has no other residence and *Lacks the resources or support networks to obtain other permanent housing.
Meet one criteria	1. Literally Homeless 2. Fleeing/Attempting to flee DV
Meet one HUD Qualifying Risk Factors Households fleeing DV does not apply	1. Must have no appropriate subsequent housing options and must lack sufficient resources and support networks to retain housing.
Meet one local risk factor	1. Homeless

IV. Requirement Documentation

Verification of Homeless documentation must be included in the client's file and updated as needed at each recertification. The Front Door Assessment and HCRP application must be in the chart as well as the Homeless Certification Form. (*See Homeless Certification form*).

If the client is coming from an institution, the case manager must secure documentation that the client was in the institution and was homeless prior to admission. The HCRP case manager must obtain homeless certification when coming from shelter. If the household is fleeing domestic violence a Self-Declaration of Housing Status should be completed to verify the household is fleeing domestic violence and meets the category 4 definition of homelessness. Agencies have discretion to request heightened documentation from the household(s) in order to prove housing status.

Required Identification

Identification documentation must be provided for all members of the household, two I.D. for each adult and one for each child. For adults, one form of identification must be a **picture id**. Other forms of documentation include:

- Driver's license
- Social Security
- Birth certificate
- Passport

Utilities Rapid Re-housing

In some cases, in order to move into housing with Rapid Re-housing assistance, a Vectren or DP&L back bill must be paid. In most cases, households will be referred to other community resources for assistance. If all other assistance has been exhausted, the case manager will contact the utility company to get written verification with evidence of the utility company name (e-mail or letter)

Montgomery County Homeless Crisis Response Program Manual

of total amount owed in order to start utilities. It is recommended that households get on a PIPP plan to assist with future bills. Any utility bills over \$1,000 must be approved by County Staff. HCRP funds can only pay 6 months of back utility. There must be written verification of total months of assistance paid.

Documenting Income

Though income documentation is not required at entry into Rapid Re-housing, it is **expected that staff have verification of income as it is required in HMIS.** If income cannot be verified due to loss of paperwork (pay stubs) and attempts to verify by third party are unsuccessful, then the applicant can fill out a statement indicating their income status (*See Self-Declaration of Income form and Verification of Income Form*). In this case the case manager must document all attempts at third party verification in the client file.

Verification of Income

HCRP providers are required to verify types of income at entry and quarterly. Income is money that goes to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member. Annual income includes the current gross income of all adult household members. The Income Calculation form must be completed and provided as verification the household qualifies for financial assistance. Gross income is:

- The amount of income earned before any deductions (such as taxes and health insurance premiums) are made.
- Current income that the household is currently receiving at the time of application for HCRP assistance. Income recently terminated should not be included. The calculation of current income at the time of certification and re-certification is also based on the total income that the household is receiving at the time of review (*See Income Calculator Form*).
- The term “Adult household members” excludes the income earned by minors and adult children who are full time students and who are not the head of household.

Income includes but is not limited to:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation for a business, i.e., total revenue minus business operating expenses.
- Monthly interest and dividend income credited to an applicant’s bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
- Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker’s compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, child care
- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.

Montgomery County Homeless Crisis Response Program Manual

The HCRP definition contains income “inclusions” (types of income to be counted) and “exclusions” (types of income that are not to be considered) for all adult members of a household. Note that household assets are not counted as income. However, household assets may be taken into account when determining whether a household has other financial resources sufficient to obtain or maintain housing.

When dealing with a client who has sporadic income (e.g., temp service or day labor), use the average income from the last 30 days.

Client Files

Client files are assembled once an individual or household has completed a full application even if a household does not qualify for assistance. All information pertaining to the client should become part of the client file. The Client File checklist (*See Application Checklist*) contains a list of all documents that may be part of the client file, with asterisks noting those forms that should only be included if they are applicable.

Client files must be kept in a secure, locked file cabinet or desk drawer. Confidentiality regarding information contained in client files must be maintained at all times. All documents must be date stamped on the day they are received and marked as either a copy or original.

Client case files must include the following documentation:

- Running case notes
- Paperwork or electronic version describing all services provided
- Determination of eligibility of each activity or client served with supporting documentation
- Documentation of compliance with other federal requirements such as habitability standards, employment, lead based paint, etc.
- For agencies with electronic charts, all of the above documentation must be in HMIS and follow all HMIS Policy and Procedures.

V. Housing Eligibility

Once a client has been determined to be eligible for HCRP assistance and housing placement has been found, review of ownership, foreclosure status, property tax status, rent reasonableness and inspections are required.

Each unit must be checked to verify that the person named as the owner is, in fact, the owner. Ownership must be printed, date stamped and put in the households chart. Each unit must also be checked to determine if the unit is in foreclosure. Foreclosure status must be documented in the case note reflecting status

The webpage showing ownership, foreclosure status and date of construction also establishes if the housing needs a lead based paint inspection.

The websites for checking both of these are:

Foreclosure status: www.mcreatestate.org

Montgomery County Homeless Crisis Response Program Manual

Property Tax Status

Property taxes should be current on all properties where HCRP funds are used to assist the client living on that property. If the landlord/owner is not current on their property taxes, the delinquency cannot exceed one year and they must be in a current repayment plan. This information can be found at the following websites:

www.mctreas.org

Once found, the property tax information should be printed, date stamped, and a copy put in the client file. If the delinquency is more than one year and/or the landlord/owner is not on a current repayment plan, the client must select another unit.

If any additional information is needed regarding the tax status of a property, case managers may contact the Montgomery County Treasurer's office at 937-225-4010.

Landlord Documentation

Case managers must have the landlord complete a registration form which details property ownership and all contact information for the landlord and client (*See Rental Assistance Agreement Form and W-9*). A letter is sent to the landlord outlining the program and asking him/her to complete a verification form, which indicates inspections and asking for his/her verification of rent.

Rent Reasonableness and Fair Market Rent Requirements

All Rapid Re-housing participants exiting homelessness into housing must determine rent reasonableness as follows:

- The recipient first compares the gross rent (see box below) for the unit with current FMR limits, which are updated annually.

Calculating the GROSS RENT AMOUNT

To calculate the gross rent of a unit that is being tested by the FMR standard:

$$\begin{array}{r} \text{Total contract rent amount of the unit} \\ + \\ \text{Any fees required for occupancy under the lease(excluding late fees and pet fees)} \\ + \\ \text{Monthly utility allowance*} \\ = \\ \text{Gross Rent Amount} \end{array}$$

***Note:** The monthly utility allowance is added only for those utilities that the tenant pays for separately (*See Allowance for Tenant-Furnished Utilities and Other Services*) The utility allowance does not include telephone, cable or satellite television service, and internet service. If all utilities are included in the rent, there is no utility allowance.

Montgomery County Homeless Crisis Response Program Manual

Once gross rent is established, programs must compare the gross rent with the most current HUD FMR to determine if the unit can receive funding. (The most current FMR Fiscal Year can be found at www.huduser.org/portal/datasets/fmr.html.)

If the gross rent for the unit exceeds FMR, the client **will not** be eligible for funds for **any** portion of the rent, **even** if the household is willing and/or able to pay the difference.

- If the unit's gross rent is at or below FMR, the recipient **next** uses current data to determine rent reasonableness.

Rents being paid must be reasonable in relation to rents being charged for comparable unassisted units in the same market area. There are two ways rent reasonableness can be determined:

1. Compare similar units in the same market rate with comparable location, quality, size, type, location, amenities, etc. (*See Reasonableness Checklist and Certification*).
Or
2. Written verification signed by the property owner or Management Company on letterhead, affirming that the rent for the unit assisted with HCRP funds is comparable to current rents charged for similar unassisted units managed by the same owner or property manager (*See Rent Reasonable Landlord/Property Manager Letter*).

Regardless of how rent reasonableness information is obtained (Comparison of similar units, or letter with verification in the chart); the Rent Reasonable Checklist and Certification form **must have** section A and B completed.

If the gross rent is at or below both the FMR **and** the rent reasonableness standards for a unit of comparable size, type, location, amenities, etc., HCRP funds may be used to pay the rent amount for the unit.

Inspections

A Habitability Inspection is required any time a participant is moving into housing (*See Habitability Inspection Form*). The unit must pass inspection; if the unit does not pass the habitability inspection, HCRP assistance cannot be provided to the client for that unit. The household cannot move into the unit until the unit has passed inspection. If violations of the habitability standards are found, the owner should be given a reasonable length of time to correct the problem and to have the unit re-inspected. The client must also sign the inspection form indicating their acknowledgement that the inspection has taken place.

A Lead-Based Paint Inspection must be performed on any unit where the building was built before 1978 **AND** there is a child under the age of six or a pregnant woman in the household (*See Lead Screening form*) If lead-based paint is found, the owner should be given a reasonable length of time to correct the problem and to have the unit re-inspected by a certified inspector from Public Health Dayton Montgomery County.

Montgomery County Homeless Crisis Response Program Manual

*All staff providing the Lead-Based Paint Inspection must show verification that they have Passed the HUD training on lead based paint at <https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm>. Verification of Visual Assessment Course Certification should be sent to Montgomery County to verify that the worker providing the Lead-Based Paint Inspection has passed the training. A copy of the certificate should also be available at program sites.

If a client wants to move into a property where the landlord indicates there has already been a lead inspection, as long as the landlord can produce the documentation showing the unit passed inspection and that inspection was done within the last 12 month period, that inspection will suffice. When this inspection expires, either the referring agency or individual used by the landlord will conduct a new inspection.

Reminder: A client cannot sign a lease or move into that property until a housing (habitability) inspection and lead based paint inspection (if applicable), has been completed and passed inspection. If clients do not comply with these guidelines, they forfeit assistance from the HCRP Program.

All inspections (habitability and/or lead-based paint) must be done on an annual basis. Case managers must monitor their longer-term clients and provide an inspection if the client's assistance goes beyond 12 months.

Housing Unit Location

Clients may select housing in any area in Montgomery County, pursuant to availability, affordability and rent reasonableness. It is the client's choice to determine their place of residency. Every effort should be made to provide choices of housing throughout the county to provide economic opportunities to the client and promote economic diversity and neighborhood stability by avoiding saturation of individual neighborhoods.

VI. Rental Assistance

- **Arrears** can be a one-time payment for up to 6 months of rent in arrears, including late fees on arrears.
- **Late payment** fees are only allowed with one-time rent arrears assistance. HCRP specifically prohibits late payment fees incurred by the recipient/sub recipient under rental assistance agreement with owner.
- Except for one-time payment of arrears on the tenant's portion of rent payment, rental assistance cannot be provided to participant who is receiving tenant or project based rental assistance through other public sources during same time period, including units receiving operating subsidies.
- Limits apply to total assistance an individual receives, either as an individual or as part of a family. Montgomery County requires that a household **not exceed 6 months** of assistance without approval from Montgomery County HCRP staff.

Montgomery County Homeless Crisis Response Program Manual

VII. Eligible and Ineligible Activities

Per HCRP regulations, the following are HCRP eligible activities:

- One time or short-term (1 to 3 months) and medium-term (4 to 24 months) rental assistance such as rent, security deposits, and utility deposits.
- One-time arrears payment for up to 6 months of rent, including late fees.
- Rental application fee only if fees charged by owner to all applicants.
- Security deposit payment not to exceed two month's rent.
- Standard utility deposit required by utility companies for gas, electric, water, and sewage. **Only** if other funds in the community have been exhausted. Must be documented in case notes
- Utility payments up to 24 months per participant, per service, including up to 6 months payment in arrears, per service. **Only** if other funds in the community have been exhausted. Must be documented in case notes.
- Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.
- Case management services for up to 30 days during the period participant is seeking permanent housing and 24 months during the period participant is living in permanent housing.
- Limited administrative expenses.

The following are ineligible activities under HCRP:

- Case management services exceeding 30 days during the period participant is seeking permanent housing.
- Assistance to individuals or households with income exceeding 30% of the area median income at re-certification.
- Late payment fees incurred by recipient/sub recipient under Rental Assistance Agreement with owners.
- Rental assistance cannot pay a full month rent if a person moves in mid- month. Only pro-rated rent can be paid.
- Rental assistance cannot be provided for pet fees or renters insurance.
- Rental assistance cannot be provided to participant who is receiving tenant- or project-based rental assistance through other public sources during same time period, including units receiving operating subsidies.
- Rental assistance cannot be provided for the same period covered by URA (Uniform Relocation Act) replacement housing payments.
- Legal services related to immigration and citizenship, or related to mortgages.
- Mortgage costs including fees, taxes and refinancing expenses.
- Legal services related to mortgages.
- Payment or modification of a debt.
- Storage fees arrears.
- Other costs such as credit card bills or other consumer debt, car repair or other transportation costs, travel, food, medical and dental care and medicines, clothing and grooming, home furnishings, pet care, entertainment activities, work or education related

Montgomery County Homeless Crisis Response Program Manual

materials.

- Housing payments for properties owned by the City or owned by HCRP service provider agencies and their affiliates.
- Direct cash assistance to program participants.

VIII. HCRP Policies

Denied

Dayton-Montgomery County HCRP agencies can deny an applicant during the full assessment if it has been determined they do not meet program requirements, including but not limited to:

- Client or property does not meet HCRP eligibility criteria.
- Client does not have necessary risk factors.
- Determination made that client has other financial/family resources available.
- Determination made that client is not likely to sustain housing after assistance period ends.

Note: The above requirements are determined from client's answers to questions in the application as well as additional information obtained in the assessment process.

Applicants who have gone through the assessment process must provide specific, completed documentation to the case manager. They must also maintain a means of contact so that they can be reached in the event it is determined that other documentation is needed or if there are problems with the documents already submitted. The participant (and landlord) has 3-5 business days to submit all the necessary documents. If that deadline passes and the case manager has not been contacted by the applicant (or landlord) or if it has not been determined that there are extenuating circumstances, the applicant's file will be labeled as incomplete and the client will be denied with a written notice (*See Incomplete File Form*).

Assistance can be resumed after denial or termination with Program Agency Supervisor reviewing the client information and determining if it is appropriate for client to return to previous case manager or by assigning client a new case manager. Appointment is made; client information/eligibility and current status is reviewed and financial assistance is determined.

NOTE: Any client who is denied HCRP assistance should be provided with referral information to other social service agencies in the community who have funding/programs to assist them in their particular area of need.

Termination Policy

Dayton-Montgomery County HCRP agencies can terminate program participants (*See Termination Notice Form*) for violations of program requirements including but not limited to:

- Not paying client portion of the rent or utilities
- Failing to appear for scheduled appointments without calling (no shows) - **ONLY** in extreme circumstances.
- Refusing to develop or follow a Case Plan

Montgomery County Homeless Crisis Response Program Manual

Program participants must be given a written notice of the reason they have been terminated from the program with information about the HCRP appeals process (see appeals policy in the next section). Note that when terminating assistance, agencies must exercise judgment and examine all extenuating circumstances in determining when the violations warrant termination, so that a program participant's assistance is terminated only in the most severe cases.

If a client requests continued assistance after the third month, they must be re-certified. If at recertification, they are denied, it is considered a **termination**. Client may appeal.

Program participants who successfully appeal the termination or who correct the reason for the termination can resume HCRP assistance.

The Agency Supervisor reviewing the client information will determine if it is appropriate for client to return to previous case manager or by assigning client a new case manager. Appointment is made; client information/eligibility and current status is reviewed and financial assistance is determined.

Appeals Policy

Applicants to the HCRP program have the right to appeal decisions about their eligibility, assistance or termination. The appeals process is as follows:

- Program participants must be given a written notice of the appeals process on request or if they are denied (after full assessment) or terminated from the program.
- Program participants may appeal the decision to deny them services or to terminate them from the program within 15 calendar days of the decision. The appeal may be in writing or orally and is made to the supervisor of the case manager who made the initial decision.
- A final decision about the appeal must be made and provided to the program participant within 15 calendar days of the oral appeal or of the postmark on the applicant's written appeal.
- Copies of appeals and decisions should be in the household(s) chart as well as case notes documenting the process.

Agencies 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.

The Agency Supervisor reviewing the client information will determine if it is appropriate for client to return to previous case manager or by assigning client a new case manager. Appointment is made; client information/eligibility and current status is reviewed and financial assistance is determined.

IX. Housing First

Rapid Re-housing uses a Housing First approach. A Housing First approach quickly connects and provides people experiencing a housing crisis with permanent housing and the supports needed to maintain housing- without preconditions (i.e. income, sobriety, engagement in treatment, service participation). Housing First approach is:

- Person-centered: address what people need and want relative to their housing crisis

Montgomery County Homeless Crisis Response Program Manual

- Mission –driven: Able to establish practices, process, and performance measures that support efficient and effective resolution of housing crisis
 - Focus on practices/programs that best address and resolve housing crisis and move away from unsupported practices
- Collaborative: operate collaboratively and interdependently to ensure housing needs of each person are met and system performs as intended

X. Case Management

All clients who are determined to be eligible for HCRP assistance must receive limited, housing focused case management. The housing focus indicates that housing is the first priority in evaluating client needs. Other issues are also addressed including development of short and long-term goals, training and employment needs, and budgeting as well as referrals to other community resources. Clients who need comprehensive case management to address other personal or social issues should be referred to other community resources.

Case management services during the period participant is seeking permanent housing can only be up to 30 days and 24 months during the period participant is living in permanent housing.

All programs serving families with children must identify and make contact with the local Homeless and Education Liaison.

All clients must have a case plan completed. This plan outlines a case management plan for residential stability, increasing skills or income, and other areas impacting housing stability. The plan also provides the client with the opportunity to look at their long-term housing goals, as well as strengths and potential challenges that may impact their ability to maintain their housing. This plan establishes target dates for actions in various areas which should be utilized by the case manager to help the client develop benchmarks, especially in terms of reaching short-term goals as a means of encouragement toward reaching the goals that may require more time.

Clients receiving ongoing assistance must meet with case managers periodically as agreed upon, but no less than monthly. Progress toward short-term and long term goals should be discussed. Any progress should be duly noted as well as any barriers that have arisen. The case plan should be reviewed as part of the recertification process and revised and updated as needed to reflect the client's goals.

By receiving assistance clients agree to the following:

- To meet regularly with their case manager and to contact the case manager if they are unable to make an appointment (*see Enrollment Agreement in the HCRP Application*).
- Establish a plan and budget that will help them maintain housing after assistance ends.
- Not move into a property that was built before 1978 if they have children under six years of age or are pregnant until the property passes a lead based paint inspection
- They cannot sign a lease or move in until the property has passed a habitability inspection
- Report any changes to the household

Montgomery County Homeless Crisis Response Program Manual

Since HCRP is not designed to be a permanent solution to housing instability, case managers must connect program participants to other resources through case management and referrals. Agencies that can be referred to for additional services include, but are not limited to Montgomery County Job & Family Services (WIOA, TANF, Job Bank, etc.), Goodwill, etc.

When appropriate, referrals should be made to Dayton Mediation Center to assist in objective arbitration for landlord/tenant issues as well as family concerns. Any client with a court notice or other legal papers should be referred to Legal Aid of Western Ohio.

XI. Recertification

HCRP Rapid Re-housing grantees are required to track income at both entry and 90-day mark (and every subsequent 90 day period up to 24 months). The income recertification/income tracking form (*See Recertification/Income Tracking form*) must be filled out completely by the case manager. The client's housing status and whether they continue to be at imminent risk of homelessness must be determined and documented. **In order to continue assistance in Rapid Re-housing at recertification (and every subsequent 90 day period to 24 months) income must be below 30% AMI to continue financial assistance.**

** Rapid Re-housing does NOT require notification about a change in income outside of the recertification process and has no immediate effect on the program participant's eligibility for HCRP, and HCRP assistance can continue until the next re-certification. At that time, the recertification will determine whether the program participant continues to be eligible for assistance.

All inspections (habitability or lead-based paint) must be done on an **annual** basis. Case managers must monitor their longer-term clients and provide an inspection if the client's assistance goes beyond 12 months.

The case plan should be reviewed as part of the 90 (180, 270 if applicable) day mark and re-certification process and revised and updated as needed to reflect the client's goals.

Client Contribution

Because HCRP is a temporary assistance program clients are expected to contribute to their housing costs as soon as the initial crisis is resolved. Based on the client's financial situation, in most cases, a client may enter into an agreement to make partial rent payment, while HCRP pays the remaining portion. Based on Clients income, assistance to the client's portion of rent should gradually increases (usually 25%, 50%, 75% of the rent) until they begin paying their entire rent. At that time, a determination will be made as to whether the client can sustain their housing, paying full rent. If not, and the client is still eligible for HCRP, assistance may continue up to a maximum of 12 months (with recertification or review at three month intervals). Any household needing services longer than 12 months must be approved for continued assistance by Montgomery County Staff.

Montgomery County Homeless Crisis Response Program Manual

XII. HMIS

The following procedures should be used to determine if a household should be entered into HMIS:

- All households who receive financial assistance will be entered into HMIS (except clients who refuse to sign the HMIS release)
- All households who receive Rapid Re-housing services from a case manager in person but do not receive financial assistance or is deemed ineligible after the HCRP application is completed, will be entered into HMIS (except clients who refuse to sign a HMIS release)

Data for all clients who complete a full assessment and sign the HMIS Consent form must be entered into HMIS whether or not they are approved for HCRP assistance. Client data should be entered in the HMIS on a daily basis by the designated HMIS license holder. This allows for more current data and assists in preventing irregularities that can occur when a client attempts to obtain services from more than one agency.

When a client exits HCRP, a HMIS exit form (*see HCRP Exit Interview form*) is completed and that data is entered into HMIS. Once a client is exited from HMIS, if they return for assistance after a period longer than 30 days, all paperwork must be filled out again as if they were a new client. However, the participant will retain the same HMIS number and data will be entered as a new occurrence.

HMIS data is monitored by the HCRP Program Grant Recipient/CoC on an ongoing basis. The contractual agreement for all case management service provider agencies is that the HMIS data reflect 95% to 100% accuracy. That level of accuracy is mandatory at the time of quarterly reporting. Activities funded must comply with HUD's standards on participation, data collection and reporting under local HMIS.

Agencies are required to enter service transactions that reflect current funds being used to pay on behalf of the household (rent, deposit, etc.). Providers must also enter information in the HMIS Assessment tab and complete the following: HCRP Eligible, Housing Information, Criteria, and HCRP.

Entry/Exits in HMIS must be completed solely for this contract. Other Rapid Re-housing funds must have as separate entry/exit.

For more information on HMIS, call the HMIS Help desk at 225-4242.

XIII. Conflict of Interest

Organizational Conflict of Interest

HCRP assistance may not be conditional on use of services or shelters owned by the HCRP recipient or sub recipient of funds and cannot conduct the initial inspection evaluation for individual/families occupying housing owned by the sub recipient (including any parent subsidiary).

Montgomery County Homeless Crisis Response Program Manual

Individual Conflict of Interest

No person described in the above paragraph who exercises or has exercised any functions or responsibilities with respect to activities assisted under the HCRP program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure. All charts must have a Staff Certification of Eligibility (*See Staff Certification of Eligibility Form*) verifying that there is no conflict of interest.

Any fraudulent use of HCRP funding is crime. All applicants must sign a form (*See HCRP Application page*) stating that they understand that fraud is investigated by the Department of Housing and Urban Development, Office of Inspector General, and may be punished under federal laws to include but not limited to, 18 U.S.C. 1001 and 18 U.S.C 641. They further understand that if any information is found to be false, they will be subject to criminal, civil and administrative penalties and sanctions.

XIV. Check Writing

Once a client has been determined to be eligible, the case manager must fill out a voucher request and (*See Request for Payment Form and Service Summary Sheet*) provide supporting documentation to the financial officer at each agency. Individual agencies will review requests, and if all paperwork is in order, a check(s) is written within three business days. The cash assistance is always paid to the third party, which may be the landlord, a property manager acting for the landlord, a utility company or other approved vendor. Checks are never given directly to the household to pay assistance.

The case manager will keep a copy of the voucher and check in the client file. The provider will provide a weekly report of checks written to case managers. This report should be reconciled with submitted vouchers to identify any outstanding items.

Every January the agency must prepare and mail 1099 forms to all landlords who have received HCRP funding during the previous year.

XV. Re-Imbursement

Verification of eligibility for all households must be submitted and approved by Montgomery County Staff before an agency will be reimbursed for expenses. The HCRP Household Eligibility checklist will be used to verify eligibility for all households who receive HCRP Rapid Rehousing assistance.

***Note: Not all scenarios are not covered in this manual. If there are questions regarding specific funding scenarios, please contact Homeless Solution Staff.**