

Rapid Rehousing Exit Policies and Procedures

1. Purpose and Scope:

- a. The purpose of this policy and procedure document is to outline the Rapid Rehousing (RRH) client exit process for CoC-FL 507 Rapid Rehousing programs.
 - i. Procedural aspects outlined below are specific to Coordinated Entry Participating providers. Some procedures may need to be modified, per agency, for non –CES participating providers.
- b. This policy and all RRH case management is founded in Housing First and Person-Centered Care principles. Providers participating in CoC-FL 507 are required to follow those overarching principles, as well as Rapid Rehousing Case Management Standards, when applying the policies outlined below.
- c. All policies and procedures outlined in this document are subject to funding guidelines. If a funder has guidelines that directly contradict a policy or procedure below, the funding guidelines will supersede.

2. Length of RRH Rental Assistance

- a. Clients may receive a maximum of 12 full months of RRH Rental Assistance per discretion of their Case Manager (CM). A full month is any month in which a rent payment is made to cover an entire month (from the 1st).
- b. CMs use progressive engagement principles to taper assistance according to client need. Not all clients will need 12 months of rental assistance and should be exited once they are deemed self-sufficient or meet other criteria for case closure (Paragraph 5).
- c. RRH Rental Assistance Extension Request Process:
 - i. The primary purpose of the Extension Request process is to determine if a client should receive up to twelve additional months of rental assistance after exhausting 12 full months in the program. RRH clients must have specific approval in order to receive more than 12 months of Rental Assistance.
 - ii. CMs are required to submit an Extension Request for every client who has completed 11 full months of Rental Assistance and who the CM deems would benefit from continued rental assistance past 12 months. Review Forms must be submitted at any time during the 11th full month of rental assistance, but no later than the 5th of the 12th full month of assistance.
 1. Example: Client moved in to housing January 15th. January would be the 12th full month of Rental Assistance. An Extension Request may be submitted at any time in December, but no later than January 5th to determine if rental subsidy will continue for February rent.
 - iii. HSN staff (and in some cases a funder) review all extension requests and make determinations based on information provided by CM and client. CM will be

notified of final determination within 3 business days of submitting client extension form and all supporting documentation.

- d. Transfers to Other RRH Funding Sources:
 - i. Under certain limited circumstances, clients may be transferred from one RRH program to another to further extend RRH services.
 - ii. Minimum criteria to be eligible for consideration for transfer include:
 - 1. Clients must meet income eligibility for the RRH program they will be transferred to.
 - 2. Clients must have a specific issue/barrier that is reasonably likely to be resolvable, but will take an additional 8-12 months to resolve.
 - iii. Transfers are not guaranteed and will be considered on a case-by-case basis.
 - iv. Case Managers must submit an Extension Request Form (following the same process as above) to HSN in order to have client reviewed for a potential match to another RRH program/funding source.

3. Security Deposits

- a. What Happens to the security deposit when a client moves?
 - i. Homeless Services Network has the First Right of Refusal for security deposits per the HAP (Housing Assistance Payments) Agreement. Security deposits will be made payable to HSN from the landlord at the end termination of the lease. The following standard and policies should be applied
 - 1. Completed Program:
 - a. Clients who have successfully completed the RRH program and remain in the same unit (renews lease), the security deposit carries over to year two (2) and will be issued to the client from HSN upon lease end.
 - i. Damages to the unit takes precedence. The remaining portion of the security if any will be issued to the client in the above scenario.
 - 2. Approved Rehoused Clients:
 - a. It is important to remember that the security deposit for the original unit will not be returned to the client upon rehousing in the new unit. What is left of the original security deposit will go towards the deposit on the new unit. Clients are not required to pay a deposit out of pocket on the new unit. The second deposit will follow the policy outlined.
- b. Damages/ Abandonment of Property
 - i. Security deposits will be used to reimburse a participating Landlord for physical damages and/or abandonment or eviction of the unit.
 - 1. Damage to a property is defined as exceeding normal wear and tear.
 - 2. Damages above the security deposited paid by HSN can be at the expense of the tenant to make the landlord whole if HLT is not able to negotiate with the landlord.

c. Cleaning Costs

- i. If the cleaning necessary is excessive, and not the result of normal wear and tear, the landlord can keep a portion of the tenants deposit to cover cleaning cost.
 1. A tenant is responsible for cleaning the unit and should not leave the unit with trash, food in the refrigerator, and numerous personal belongings throughout the unit in effort to retain as much as the security deposit as possible.

4. Phases of Client Exit and Follow Up:

- a. Regardless of Reason for Exit, the following standard policies and procedures should be applied to all clients exiting RRH programs. Additional documentation and information may need to be collected for specific circumstances, as outlined in Paragraph 5.
 - i. Ending Rental Assistance:
 1. CMs will complete appropriate fields on Monthly Exit List Form (Section 1.b. of Exit Form) to indicate when a client's Rental Assistance will end. Exit List will be submitted on the 5th of the month for clients who are receiving their last HSN rent payment assistance that month.
 2. Both client and landlord will be issued Rental Assistance Exit letters to indicate the end date of rental assistance. Clients and Landlords will be notified *at least* 20 days in advance of ending rental assistance.
 - a. Rental Assistance Exit letter will be uploaded into HMIS.
 3. If client will be participating in Follow Up Case Management services (see paragraph ii below), they will remain open in HMIS once Rental Assistance has ended. If they are not participating in Follow Up Case Management, CM should follow RRH HMIS Workflow to exit client accordingly.
 4. Once exited from Rental Assistance, a client cannot re-enter the rent payment phase of the program for their current program enrollment. A client is considered exited from rental assistance if a full month passes without rental assistance being provided to the client.
 - ii. Providing Case Management After Rental Assistance Ends – First 3 Months (i.e.: Follow Up Case Management)
 1. In general, all clients who received rental assistance should be offered Follow Up Case Management for up to three months after rental assistance ended. Some exceptions apply and some situations are based on CM discretion, as outlined under specific "Reasons for Case Closure" in paragraph 5.
 - a. Follow Up Case Management is a voluntary service that a client may decline. If a client declines these services, this should be documented per a Case Note in HMIS.

2. Clients will stay on CM's official caseload for up to three months after rental assistance ends to ensure housing retention. The three month period begins in the first month the client takes over their full rent payment.
3. During these three months, the CM will make contact with client at least one time each month to continue RRH Case Management. Face-to-face contact is not required during the follow-up phase of the program. Additional contacts should be made as deemed necessary.
4. If a client does not engage in follow up case management services in any given month, the CM can move forward with closing the case prior to the 3 month period concluding.
5. These Case Management follow-up touches should be focused on housing retention. CMs will communicate with clients and link them with community resources to help maintain housing should any issues arise.
6. Contact for case management follow-ups will be documented in HMIS per case notes and interim updates.
7. At the end of the 3-month case management follow-up period, the CM will:
 - a. Issue the client a final exit letter, to indicate that Follow Up Case Management services are ending.
 - i. Exit letter will be uploaded in HMIS.
 - b. Include client in the appropriate field on the monthly Exit List Form (Section 1.a. of Exit Form)
 - c. Exit the client from the RRH project in HMIS. CM should refer to RRH HMIS workflow to ensure case is closed out appropriately in HMIS.

5. Determination of Client Exit:

- a. Clients Exiting within 12 months of Rental Assistance
 - i. Determining the appropriate time to exit a client is a decision made at the provider level.
 - ii. HSN will monitor client exits to ensure exit is documented appropriately. If HSN reviews a client exit and has concerns regarding reason for exit, they may reach out to provider agency for additional information.
- b. Extension Process for Clients Exceeding 12 months of Rental Assistance
 - i. Providers determine which clients they will request an extension of services for.
 - ii. HSN (and in some cases the funder) make a final determination on if the client is extended, and for how many additional months.
- c. Clients Exiting for Non-Compliance
 - i. Non-Compliance exits must always be approved at the provider level by CM as well as Program Manager.

- ii. Due to the nature of Non-Compliance exits, CMs and PMs will have the ability to staff such cases through a peer review process to determine if exit is appropriate. This process is optional.

6. Reasons for Client Exit:

- a. Reason for Case Closure: Client has supports and resources necessary to sustain housing on their own.
 - i. Criteria: CM has reviewed all supports and determined that client is no longer in need of rental subsidy to sustain housing.
 - ii. Termination of Assistance:
 - 1. Rental Assistance (if applicable): Client to be included on next monthly Exit List Form once determination is made.
 - 2. Follow Up Case Management: Client is eligible to receive three months of follow up case management.
 - iii. Information to be included in Case Notes:
 - 1. Overview of Client Supports and how those supports will impact housing stability
 - a. Financial Supports
 - b. Social Supports
 - c. Community Support
 - 2. Exit Plan that client and CM have developed
 - iv. Required Documentation to be Uploaded in HMIS
 - 1. Proof of income
- b. Reason for Case Closure: Client no longer eligible to receive services
 - i. Criteria: A client will be exited from RRH if they are deemed ineligible during the course of the program for any of the following reasons:
 - 1. Household Composition:
 - a. Minor children are no longer residing in the household at least 50% of the time.
 - i. If DCF is not involved, clients have 30 days for children to return to the home.
 - ii. If DCF has removed children from home, client will be allowed up to 90 days to determine reunification plans.
 - b. Note: This criteria refers mainly to children being removed from the household for any reason. If a household no longer has minor children because the children have turned 18 while enrolled in the program, this household may remain enrolled in the program.
 - 2. Exceeding Program Income Limit:
 - a. After income calculation, client exceeds income limits for program.
 - 3. Relocation outside of CoC Service Area

- a. Client left the CoC service area and has no plan to return, or has signed a lease outside of the service area.
 - b. Client expressed during the housing search process that they do not want to live in the CoC service area.
 - ii. Termination of Assistance:
 - 1. Rental Assistance (if applicable): Client will be listed on next monthly Exit list form and exited from rental assistance accordingly.
 - 2. Follow Up Case Management services: Client is eligible to receive follow up case management, per the discretion of the CM.
 - iii. Information to be included in Case Notes:
 - 1. Household Composition:
 - a. Court dates
 - b. Reunification plans
 - c. If no DCF involvement, explanation of why child is not in home
 - 2. Exceeding Program Income Limit:
 - a. Proof of Income
 - 3. Relocation:
 - a. Where client is relocating to
 - b. Reason for relocation
 - iv. Required Documentation to be uploaded in HMIS:
 - 1. Household Composition:
 - a. If DCF involvement: last judicial review along with dependency case manager update
 - 2. Exceeding Program Income Limits:
 - a. Proof of income
 - b. Income calculation form indicating over income
 - c. Interim Update to reflect new income
 - 3. Relocation:
 - a. Signed lease in new location (if applicable to situation)
 - b. Letter or statement from person client is moving/staying with (if applicable to situation)
- c. Reason for Case Closure: Enrolled in other housing program with subsidy
 - i. Criteria: A client will be exited from RRH if they enroll in another housing assistance program with a rental subsidy.
 - ii. Termination of Assistance:
 - 1. Rental Assistance (if Applicable): Rental Assistance will terminate once client is enrolled in new program. CM will notify HSN immediately of enrollment to ensure no duplication of rental services. CM will also place client on next Exit list form.
 - 2. Follow Up Case Management: Case Manager can provide up to one additional month of follow up case management services to ensure a smooth transition to new program.

- iii. Information to be included in Case Notes:
 - 1. Information about program client is enrolling in, including: program type, terms of assistance, eligibility criteria, if the program is inclusive of case management services, etc.
- iv. Required Documentation to be uploaded in HMIS
 - 1. Program Welcome letter, Copy of Voucher, or other proof of client's acceptance into program
- d. Reason for Case Closure: Voluntary Exit
 - i. Criteria: Client expresses that they are no longer interested or in need of RRH services
 - ii. Termination of Assistance:
 - 1. Rental Assistance (if applicable): Rental Assistance will terminate once client has expressed their desire to leave RRH program.
 - 2. Follow Up Case Management: Client not eligible for follow up case management.
 - iii. Information to be included in Case Notes:
 - 1. Why client no longer interested in receiving services
 - iv. Required Documentation to be uploaded in HMIS
 - 1. Signed statement written by client indicating their desire to leave the program
- e. Reason for Case Closure: Non-Responsiveness
 - i. Criteria: Client is not in contact with Case Manager or other CES connected community partners (i.e.: employment specialist, SOAR, etc.) for 30 days or more if client is in housing search, or 60 days or more if client is housed. No contact means no calls, voicemails, emails, texts, or in-person visits.
 - ii. Termination of Assistance:
 - 1. Rental Assistance (if applicable): Client should be placed on next Exit List following 60 days of non-responsiveness.
 - 2. Follow Up Case Management: Client is not eligible to receive Follow Up Case Management services.
 - iii. Information to be included in Case Note:
 - 1. Attempts to reach client (weekly attempts should be made)
 - 2. Attempts to reach other community partners who may be in contact with client
 - 3. Review of potential reasons why client may not be non-responsive
 - iv. Required Documentation Uploaded in HMIS
 - 1. Letter of pending case closure for non-responsiveness sent to client's home or communicated in another way (ex: email)
- f. Reason for Case Closure: Client has been non-compliant with case plan goals and program

- i. Criteria: Client has made no progress, or inconsistent progress, towards case plan goals and CM has exhausted all efforts to engage the client and overcome barriers to client success.
 - 1. Client progress toward goals should be measured and reassessed during three month review periods.
 - 2. Client should be given warning if they are not meeting their case plan goals and time to resolve issues.
 - 3. All Non-Compliance exits should be staffed by agency program manager before final determination is made and client is notified.
- ii. Termination of Assistance:
 - 1. Rental Assistance (if applicable): Client will be placed on next monthly Exit list once determination has been made.
 - 2. Case Management: Client will be eligible, at the discretion of the case manager, for up to three months of follow up case management.
- iii. Information to Include in Case Notes:
 - 1. All 3-Month Reviews should be documented in case notes
 - 2. All discussions around non-compliance issues
 - 3. Accountability plans
- iv. Documentation
 - 1. Accountability tools (i.e.: job search logs)
 - 2. Completed case plan forms indicating no progress on goals
- g. Reason for Case Closure: Client has entered jail, rehab, or some other institutional situation.
 - i. Criteria: A client will be exited if they have been admitted into an institutional situation and there is no household member to either maintain a lease (if already in housing) or sign a lease (if in housing search). In these situations, an exit will occur if the verified exit date is longer than 90 days from date of entry into institution or if there is no verified exit date and client has been in institution for 90 days.
 - 1. Note: For clients who are in the housing search process, HSN may approve client to remain in program if they have been in institution longer than 90 days. CM may contact HSN to advocate on behalf of the client if they believe situation will be resolvable in a reasonable amount of time.
 - ii. Termination of Assistance:
 - 1. Rental Assistance (if applicable):
 - a. If CM knows exit date will be longer than 90 days: CM will notify HSN immediately and place on next exit list.
 - b. If exit date is unknown, CM will place client on exit list for month in which they will pass the 90 day mark.
 - 2. Follow Up Case Management: Client is eligible to receive three months of follow up case management, at the discretion of the CM.

- iii. Information to Include in Case Note:
 - 1. Exit date from institution (if applicable)
 - 2. Reason for entering institution
 - 3. Documentation of Case Manager's attempt to contact client in the institution
 - iv. Documentation
 - 1. Official documentation from institutional facility indicating a client entry and exit date (if available)
- 7. Client Appeal Process
 - a. Clients have a right to appeal their exit from a RRH program. Client appeals should start at the provider level. If the provider is unable to rectify the decision internally, they may contact HSN and have the client's appeal reviewed by HSN staff.
 - b. All RRH programs must have a client appeal process in place at their agency. Appeals must be handled and determined by members of the agency who did not have direct oversight of the client case while enrolled in RRH.
 - c. Clients must be provided with a copy of the agency appeal process at program Entry and Exit.

Updates from Version 1.0

- Section 2: Length of Rental Assistance
 - Rental assistance can now be provided for up to 12 months, instead of 10, at the discretion of the RRH case manager. Extension procedures were modified to reflect the new timeframe.
- Section 5b: Exit Due to Ineligibility
 - Language added to clarify that RRH families can still be served if the only minor child in the household turns 18 after the family is enrolled in RRH.
- **Updates from Version 2.0**
 - Section 3- Security deposits added