

COOK, LAKE, ITASCA,
KOOCHICHING
HOUSING ISSUES
ACTION COMMITTEE
(CLIK-HIAC)

2018

*Policies &
Procedures*

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Introduction

FHPAP Purpose

Family Homelessness Prevention and Assistance Program (FHPAP), as established by the 1993 Minnesota Legislature, assists families with children, single adults, and youth who are homeless or are at imminent risk of homelessness. The purpose of the program is to support continuing innovation and development of a comprehensive system to prevent homelessness and to assist people experiencing homelessness. With the primary emphasis on prevention, the goals of the program are to:

1. Prevent homelessness
2. Minimize the number of days homeless
3. Eliminate repeated episodes of homelessness

Each project designs its own service delivery system to achieve these goals, using approaches that make sense at the local community level. Funds are awarded in the form of a grant over a state biennium period. Distribution of grant funds is made at the discretion of Minnesota Housing. Grant funds are contingent upon approval by the Minnesota Legislature.

As a temporary and short-term support program, FHPAP is not one of ‘welfare’ or entitlement programs. It is a program that should target people who are currently homeless or at-risk of homelessness AND could find and maintain their housing with a minimal help. FHPAP assistance is a part of a community’s continuum of services. The flexibility of FHPAP funds should complement and leverage other area services and fill gaps in the homeless response system.

Document Purpose

This document is intended to explain requirements and provide guidance for Cook, Lake, Itasca, and Koochiching (CLIK) FHPAP programs. All subgrantees are expected to review and comply with the requirements outlined in this document. This document is not intended to supersede any applicable statutes or regulations and providers are encouraged to consult relevant statutes and regulations regularly to ensure compliance. Any exceptions to requirements in this document must be included in the subgrantee’s contract with the CLIK FHPAP Grantee (KOOTASCA Community Action).

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CLIK FHPAP Program Standards

The CLIK FHPAP Advisory Committee has identified and defined four models that will be implemented with FHPAP resources. These models are:

- *Light Touch*—Light touch services accompanied at times with very minimal financial assistance to help resolve housing crisis (FOR PREVENTION ONLY).
- *One-Time Assistance*—One-time financial assistance accompanied with light touch services to help resolve housing crisis (HOMELESS OR PREVENTION).
- *Short-term Assistance*—Short-term (less than 6 months) services and/or financial assistance to help resolve housing crisis (HOMELESS OR PREVENTION) and reassessed on a monthly basis.
- *Medium-term Assistance / Rapid Rehousing*—Time-limited services and/or financial assistance (less than 24 months/average 8-10 months) to help prevent homelessness or quickly rehouse households from homelessness that is allocated/assessed every 3 months (HOMELESS OR PREVENTION).
-
- ***Homeless Prevention*** is defined as providing services and/or financial assistance from models identified above to households who are currently housed or doubled up and at imminent risk of becoming homeless.
-
- ***Homeless Assistance*** is defined as providing services and/or financial assistance from models identified above to households who are currently homeless.
-
- The following sections describe program standards established by CLIK FHPAP Advisory Committee for each of the models identified above.

FHPAP Model #1—Light Touch (for Homeless Prevention ONLY)

Description

CLIK FHPAP Light Touch is comprised of basic services accompanied (at times) with very minimal financial assistance to help resolve housing crisis.

Eligibility

In order to be eligible for Light Touch, households must meet the following criteria:

- At risk of homelessness
- Low income (less than 200% poverty level)
- Employed or starting a job within the current month, or connected to other income (SSI, etc.) that will likely be sustainable.
- Likely to stabilize with minimal assistance (one-time guidance/assistance)
- Homeless Prevention Targeting Tool score of 0-12

Services Provided

Light touch services will be provided on a very short-term basis (less than a month, in most cases one-time). Light touch services include the following:

- Light Case Management including:
 - Basic budget awareness (where you can save, where you can add income)
 - Problem solving
 - Tenant education
- Referrals
 - Housing list, applications
 - Legal Aid, Homeline
 - Employment services
 - MH/CD (ARMHS)
 - Mainstream resources
 - Immigrant resources
- Light advocacy on behalf of client

Direct Financial Assistance

Financial assistance is not expected to be provided to most households who are served by the Light Touch model. As needed, households may receive up to \$100 in one-time funding for the transportation assistance (gas, minor assistance) or other material and financial assistance.

Performance Standards

80% of households served will not return to homeless prevention programs within next 3 months (immediate crisis resolved)

FHPAP Model #2—One-time Assistance (for Homeless Prevention and Homeless Assistance)

Description

One-time financial assistance accompanied with light touch services to help resolve housing crisis.

Eligibility

In order to be eligible for One-time Assistance, households must meet the following criteria:

- At imminent risk of homelessness or currently homeless (including doubled up)
- Prevention Targeting Tool score of 13-15 or VISPDAT score less than 8
- Low income (less than 200% poverty level)
- Employed, likely to be employed or connected to other income (SSI, etc.) that will likely be sustainable within 1 month.
- No other means to resolve crisis, likely to become homeless but for this assistance.
- Likely to stabilize with limited assistance (within 1 month)

Services Provided

Services will be offered to households on a very short-term basis (less than a month, in most cases one-time). One-time Assistance services include the following:

- Light Case Management including:
 - Basic budget awareness (where you can save, where you can add income)
 - Problem solving
 - Tenant education
- Referrals
 - Housing list, applications
 - Legal Aid, Homeline
 - Employment services
 - MH/CD (ARMHS)
 - Mainstream resources
 - Immigrant resources
- Advocacy on behalf of client, including landlord engagement

Direct Financial Assistance

Financial assistance is expected to be provided to all households who are served by the One-time Assistance model. One-time financial assistance is provided once (or for one month). The follow expenses are eligible for One-time Assistance:

- Rental Assistance
 - 1st/Last rent
 - Deposit
 - Housing application fees (no more than 2 per household)
- Utility assistance (including past due)
- Transportation assistance (when directly connected to housing stability services/assistance)
- Other material and financial assistance (only upon approval of Grantee)

Direct Financial Assistance Targets

The target amount per household is \$750 per household without children and \$1,000 per household with children. **Subgrantees are permitted to exceed spending targets for issues they believe warrant such action. All instances in**

which targets are exceeded must be reported (in writing and verbally) at the next occurring CLIK FHPAP Advisory Meeting.

Performance Standards

- 90% of households will be housed at program exit
- 85% of households will not become homeless.
- 75% of households will not return to homeless prevention programs within the next year.

FHPAP Model #3—Short-term Assistance (for Homeless Prevention and Homeless Assistance)

Description

Short-term financial assistance (including a portion or all of rent) with light-touch support services provided on a short-term basis (less than 6 months).

Eligibility

In order to be eligible for Short-term Assistance, households must meet the following criteria:

- At imminent risk of homelessness or currently homeless (including doubled up)
- Prevention Targeting Tool score of 16-20 or VISPDAT 4-8
- Low income (less than 150% poverty level)
- Employed, likely to be employed or connected to other income (SSI, etc.) that will likely be sustainable within 3 months.
- No other means to resolve crisis, likely to become homeless but for this assistance.
- Likely to stabilize with limited assistance (within 6 months)

Eligibility override

Program managers may override eligibility for households that do not meet all criteria above. It is anticipated this action may be most likely for households who have scored into Light-Touch or One-Time Assistance, but are later determined to need greater supports. **Any override actions that occur must be documented in writing and presented verbally at the next scheduled CLIK FHPAP Advisory meeting.** All households served must have income below 200% poverty level and must have a documented housing crisis.

Priority Populations

The CLIK FHPAP Advisory Committee has identified the following populations to be targeted with the Short-term Assistance model:

- Households who been served previously by FHPAP
- Households with income of less than 100% poverty level
- Households with extreme high cost burden for rent (60%+ of income dedicated to housing)

Subgrantees will seek to ensure that at least **60%** of households served with Short-term Assistance are from priority populations.

Services Offered

Services will be offered to households on a short-term basis (up to 6 months). Short-term Assistance services include the following:

- Case Management and referrals that include:
 - Wrap-around services
 - RAPT team participation (for those exiting institutions)
 - Financial management, budgeting—rent wise¹
 - Employment training and support (referrals and review resumes, interview prep, clothing for interviews, etc)
 - Transportation assistance

¹ Financial management services/support will be an expected service component for all households who have previously been served by FHPAP. “Expected” means subgrantees will provide clear instruction to households served that participation is an expectation as part of their service agreement. However, subgrantees may not deny or exit a client strictly due to noncompliance with this expectation.

- Tenant education
- Connections to MH/CD services, diagnostics/assessments
- Connections to mainstream resources—SNAP, SSI, SOAR, etc.
- Housing search and placement
- Landlord mediation, education & engagement
- Connections to legal assistance—escrow, habitability, UD prevention, expungement, outstanding warrants

Direct Financial Assistance

Financial assistance is expected to be provided to all households who are served by the Short-term Assistance model. Clients may receive Short-term financial assistance is for up to 6 months). Short-term financial assistance may include:

- Rental Assistance
 - 1st/Last rent
 - Deposit
 - Housing application fees (no more than 2 per household)
- Utility assistance (including past due)
- Transportation assistance (when directly connected to housing stability services/assistance)
- Other material and financial assistance (only upon approval of Grantee OR all expenses must be approved by program manager and reported to advisory committee at next scheduled meeting)

Reassessments

Subgrantees will provide the least amount of assistance needed to ensure that households achieve housing stability. Subgrantees will re-assess each household's need for continued assistance and services on a monthly basis.

Performance Standards

- **85%** of households will be housed at program exit
- **80%** of households will not become homeless.
- **75%** of households will not return to homeless prevention programs within the next year.

Medium-Term Assistance / Rapid Rehousing

Description

Medium-Term Assistance/Rapid Rehousing (MTA-RRH) is a time-limited (up to 24 months) intervention intended to prevent homelessness for household with high barriers to housing stability OR to house families or individuals experiencing homelessness as quickly as possible. MTA-RRH is a housing first, no-barrier intervention with no preconditions to enrollment other than homeless prevention tool score or homeless status. The level of case management and financial assistance is based on a progressive engagement model where the minimum amount of services is provided before increasing support to meet the household's needs. In some cases, households with more severe barriers to housing may require service-intense resources (i.e. Critical Time Intervention) instead of progressive engagement.

MTA-RRH Eligibility

CLIK FHPAP Advisory Committee has established following criteria establish eligibility for MTA-RRH:

- At imminent risk of homelessness or currently homeless (including doubled up)
- Prevention Targeting Tool score of 21 or more or VISPDAT of 9 or higher
- No or Low income (less than 100% poverty level)
- Employed, likely to be employed or connected to other income (SSI, etc.) that will likely be sustainable within 3 months.
- No other means to resolve crisis, likely to become homeless but for this assistance.

Subgrantees must adhere to CLIK FHPAP MTA-RRH eligibility criteria and may not add any criteria without written approval from CLIK FHPAP Advisory Committee. Criteria will not include a period of sobriety, a commitment to participation in treatment, or any other criteria designed to "predict" long-term housing stability other than willingness to engage the program and work on a self-directed housing plan.

Eligibility override

Program managers may override eligibility for households that do not meet all criteria above. It is anticipated this action may be most likely for households who have scored into Short-term Assistance, but are later determined to need greater supports. **Any override actions that occur must be documented in writing and presented verbally at the next scheduled CLIK FHPAP Advisory meeting.** All households served must have income below 200% poverty level and must have a documented housing crisis.

Priority Populations

The CLIK FHPAP Advisory Committee has identified the following populations to be targeted with the MTA-RRH model:

- Households with no income
- Households served by short-term that reveal higher barriers (thru reassessment), needing ongoing support
- Households with disabilities

MTA-RRH Program Design

Medium Term Assistance/Rapid Rehousing includes three core components:

- Housing Identification Services (primarily for homeless households or prevention households that need to move)
- Housing Stability Services
- Financial Assistance

Housing Identification Services

Within the limits of the participant's income, a MTA-RRH program should have the ability to help participants access units that are desirable and sustainable—those that are in towns/neighborhoods where they want to live in, that meet participants' transportation needs, are close to employment, and that are safe.

While participant involvement and direction should be sought in the housing search process, it is ultimately the MTA-RRH program's responsibility to identify and secure housing for each household.

Housing identification efforts should be designed and implemented to actively recruit and retain landlords and housing managers willing to rent to program participants who may otherwise fail to pass typical tenant screening criteria. Critical to the formation of landlord-program relationship is the recognition of the landlord as a vital partner. The MTA-RRH provider must be responsive to landlords to preserve and develop those partnerships for the purposes future housing placements.

Additional Housing Identification Policies

- Program staffing—MTA-RRH programs must assign staff whose responsibility is to identify and recruit landlords and encourage them to rent to homeless households served by the program.
 - Staff must possess the knowledge, skills, and agency resources to understand landlords' perspectives, understand landlord and tenant rights and responsibilities, and negotiate landlord supports.
 - Job descriptions must include responsibilities including landlord recruitment and negotiation.
- Landlord engagement
 - MTA-RRH staff will continually engage in the recruitment and retention of landlord partners and will develop methods of tracking landlord partners including: unit locations, characteristics, what they like, don't like, experiences, and costs. MTA-RRH programs will work collaboratively to the greatest extent possible.
 - MTA-RRH staff will make themselves familiar with the screening information landlords collect to identify prospective tenants. This information can help match program participants with landlords and units.
- Landlord agreements
 - MTA-RRH programs will use the "Rental Assistance Agreement" form (*see forms*) with all landlords/property owners.
 - MTA-RRH staff will provide contact information to landlords to reach appropriate staff, will respond to landlord calls within one business day, will mediate disputes between program participants and landlords, may pay for damage caused to units, will make rental assistance payments, and will encourage timely tenant portion payments.
 - MTA-RRH staff are expected to contact the appropriate organizations or authorities regarding any landlords who repeatedly fail to comply with licensing/building requirements and/or fail to correct violations.
 - MTA-RRH staff will review housing court records and/or survey program participants about their satisfaction with landlords to identify patterns in landlord behavior that would suggest they should not be program partners.
- Housing Search
 - MTA-RRH staff will work with participants to develop a Housing Stabilization Action Plan (*see forms*) to identify the participants' housing goals, barriers and concrete action steps the participant and MTA-RRH staff will take to seek and secure housing.
 - MTA-RRH staff will encourage, but not require, participants to engage in the housing search process. The onus is on the program to provide housing choices, but this does not preclude program participants from conducting their own search and choosing housing they identify independently. Participants' involvement in search will help to empower participants and will also help them to understand potential barriers to accessing housing.
 - MTA-RRH staff will support participants in self-determination and self-advocacy to identify and secure housing that best matches their resources and preferences.

- MTA-RRH staff will provide participants with appropriate housing choices within practical constraints.
- MTA-RRH staff will assist participants in making an informed housing choice with the goal that the participant will be able to maintain after program exit, even when the household will experience high housing cost-burden. While, participants ultimately choose their housing unit, staff will use housing and budgeting plans that help participants understand the likelihood of being able to pay rent and meet the requirements of the lease by the end of assistance.
- MTA-RRH staff will provide participants with CLIK FHPAP overview of landlord-tenant rights & responsibilities and are responsible for providing education and support to participants.
- MTA-RRH staff will seek to house participants as quickly as possible. At times, there are barriers that make the housing search quite difficult. While FHPAP MTA-RRH does not place a limit to the number of months MTA-RRH staff may assist participants in locating suitable housing, MTA-RRH programs must report housing search efforts that take longer than 6 months to the FHPAP Advisory Committee on a quarterly basis.
- **Negotiate with landlords**—as necessary, to help participants access housing.
 - MTA-RRH staff will provide participants with coaching and supports needed to successfully navigate housing applications and landlord interviews while promoting self-advocacy and independence to the greatest extent possible.
 - Leases (legally binding, written) will be established between the participant and landlord. MTA-RRH staff will review leases with participants carefully. **Leases with additional requirements, such as drug testing or program participation, are not allowed without participant consent.**
 - Rental Assistance Agreements will be established between the MTA-RRH program and landlords (*see forms*). Rental assistance payments will be made by the MTA-RRH program directly to landlords/property owners.

Housing Stability Services

MTA-RRH housing stability services reflect the time-limited nature of the MTA-RRH assistance. It focuses on addressing the immediate housing crisis. The focus is rapid access to housing and housing retention by helping a household build a support network of community resources and service options outside of the program (i.e. legal services, health care, vocational assistance, transportation, child care, etc.).

MTA-RRH programs may provide or connect participants to the following services to each household for up to 24 months. Services listed need not be PROVIDED to each household, but must be AVAILABLE to households as required to promote housing stability (directly through the provider or by access to community organizations). Financial management, budgeting—Rent wise

- Wrap around services and WRAP team participation
- Employment training/support (referrals, resume support, interview prep, clothing for interviews, etc)
- Landlord mediation, education & engagement
- Connections to mainstream resources
- Mental Health/Chemical Health services, diagnostics, and assessments
- Tenant education and independent living skills
- Family reunification
- Legal assistance
- Established services/partnerships for immigrant populations

At intake, MTA-RRH staff will work with the participant to develop a housing support plan which will include participant goals and actions. This form will be reviewed with the participant at regular MTA-RRH staff visits. Housing support plan forms will be updated at least every three months.

As a general guideline, MTA-RRH providers will seek to meet with participants at least on the following basis:

- While participant is still homeless and searching for housing—1-2 times/week
- Initially housed or at prevention intake—2-4 times/month

- Once stably housed—once/month
- If crisis or significant changes occur with participant—at least weekly

MTA-RRH housing stability services should be flexible in intensity—offering only essential assistance until or unless the participant demonstrates the need for or requests additional help. The intensity and duration of services will be based upon the needs of individual households and may lessen or increase over time. Services should be OFFERED to participants at least once per month.

MTA-RRH programs will document service provision as well as attempts to connect with participants where services were not provided. MTA-RRH staff will make at least three attempts per month to set up an appointment with the participants and will record attempts in case notes. All attempts to meet with participants will be documented in case notes and reviewed in site visits by the Grantee and MN Housing.

MTA-RRH housing stability services are not mandated. Services offered by a program have voluntary participation and should be participant-driven. Case managers should actively engage participants in voluntary service participation by creating an environment in which the participant is driving the case planning and goal-setting based on what they want from the program and services, rather than on what the case manager decides they need to do to be successful.

Except where dictated by the funder, program participants will direct when, where, and how often case management meetings occur. Meetings will occur in a participant's home and/or in a location of the participant's choosing whenever possible. MTA-RRH staff will follow Home Visit Safety Procedures (see appendix I-III)

MTA-RRH Case managers must respect a program participant's home as their own, scheduling appointments ahead of time, only entering when invited in, and respecting the program participant's personal property and wishes while in their home.

MTA-RRH housing stability services will use a strengths-based approach to empower participants. Case managers will identify the inherent strengths of a person or family instead of diagnoses or deficits, then build on those strengths to empower the household to succeed.

Financial Assistance

MTA-RRH financial assistance will be provided to participants for up to 24 months. Eligible use of financial assistance includes:

- Rental assistance (monthly), including arrears with current unit
- Rental arrears for previously vacated unit (only upon approval from CLIK FHPAP Advisory Committee)
- Rental deposit (including additional deposits for those with higher barriers; once every 12 months unless approved to exceed by Grantee)
- Rental housing application fees (limited to two application fees or up to \$150, whichever is less, in a 12-month period per household unless approved to exceed by CLIK FHPAP Advisory Committee)
- Utility assistance (including past due)
- Transportation assistance (when directly connected to housing stability services/assistance)
- Other material and financial assistance² (no more than \$500 without approval of CLIK FHPAP Advisory Committee)

Rental Assistance cannot be provided to a participant receiving rental assistance through other federal, state or local sources.

² Examples may include moving costs, furniture/household items, childcare, food, etc. must be directly connected to housing stability

MTA-RRH programs should make efforts to maximize the number of households it is able to serve by providing households with the financial assistance in a progressive manner, providing only the assistance necessary to stabilize in permanent housing. Financial assistance should be flexible and tailored to the varying and changing needs of a household while providing the assistance necessary for households to move immediately out of homelessness and to stabilize in permanent housing.

CLIK FHPAP Advisory has established the following target financial assistance contributions per participant for MTA-RRH.

- Youth/adult family households **\$8,450** (average length of stay 9 months)
- Households with only adults **\$3,250** (average length of stay 6 months)
- Households with only unaccompanied youth **\$5,400** (average length of stay 10 months)

These target contributions are based upon a projected average contribution per month and a projected average length of stay in MTA-RRH. MTA-RRH programs may provide financial assistance above or below target amounts without consulting the grantee, but must provide written and verbal rationale for contributions that exceed targets at the nearest CLIK FHPAP advisory committee meeting.

Additional Financial Assistance Policies

- ***Rent Reasonableness***—CLIK FHPAP MTA-RRH rent reasonableness is the total rent charged for a unit and must be reasonable in relation to the rents being charged during the same period for comparable units in the private, unassisted market and must not be in excess of rents being charged during the same period for comparable non-luxury unassisted units. The rent reasonableness of the unit can be evaluated in the CLIK region by one of the following approved methods:
 - a. Use of Rentometer; <https://www.rentometer.com/>
 - b. Evaluation of three unit rental rates in the area
- ***Housing Habitability Inspection Checklist (HUD)***—MTA-RRH staff must conduct a Housing Habitability inspection and complete the checklist form to ensure that participant housing is safe and decent for the participants that they serve. This form must be completed only at the initial move in of the participant.
- ***Participant Contribution to Rent/Expenses***—Verification of income will serve as the basis for determining the household's contribution towards rental assistance. A household's future income must be projected over the next 12 months based upon the household's current circumstances. MTA-RRH programs will assume the household's current circumstances will continue for the next 12 month unless there is verifiable evidence it will be different (as determined during the 3 month re-evaluation process). Households will be required to contribute a minimum of up to 50% of their Gross Income towards their rent. This is considered to be the participant's share or portion of the rent.

MTA-RRH Performance Standards

The CLIK FHPAP Advisory Committee has established the following performance standards for MTA-RRH subgrantees based upon data from HMIS reports:

- **Avg of less than 45 days from referral to housing**
- **85% of households will be housed at program exit**
- **80% of households will not become homeless.**
- **75% of households will not return to homeless prevention programs within the next year. 85% of households will be housed at program exit**
- **65% of households will maintain or increase income at program exit.**

Additional Short-term Assistance (STA) and Medium-term Assistance/Rapid Rehousing (MTA-RRH) Policies

STA and MTA-RRH Denials

STA and MTA-RRH programs may deny an applicant if:

- The applicant does not meet the eligibility criteria noted above.
- The applicant is unable to sufficiently document their homeless status.
- The program is unable to assist the applicant in locating suitable housing after searching for 6 months³.
- The program is unable to locate the applicant following at least three attempts over at least a one week time period.⁴

Ineligibility does not bar the individual or family household from being referred at a later date.

STA and MTA-RRH Recertification

STA and MTA-RRH programs must conduct and complete re-certifications of continued need for income and services monthly (for STA) or every three months (for MTA-RRH) until the household exits the FHPAP program. STA and MTA-RRH programs will use the Recertification Form to determine whether to continue services and/or financial assistance, and at what level.

The Participant's annual income will be re-evaluated as part of this recertification process. Participants are not required to report changes in income until their next quarterly re-evaluation. If a household does report a decrease in income, an adjustment to the tenant share will be conducted to be effective the month following the report of the change.

STA and MTA-RRH Discharge

Exits from STA and MTA-RRH programs may occur for any of the following reasons:

- Participant is stable and connected to community resources (stability will be determined by case manager, but general guide is when income exceeds expenses).
- Participant has received services for the maximum program period (6 months for STA and 24 months for MTA-RRH)
- Participant has demonstrated clear desire to not participate in program services, as demonstrated by:
 - The participant is absent from their assisted unit for more than 10 consecutive days;
 - The participant is utilizing duplicate subsidies (Public Housing, Section 8, Section 202, Section 811, Section 221, Section 236, Section 514, Section 515)
 - The Participant has communicated, in writing or with third party witness, their intent to leave the program.

The following steps are required to successfully discharge a person from a STA or MTA-RRH program:

- Provide a formal exit notice to the participant which includes a clear statement of the reasons for exit and instructions for appealing the decision.
- Conduct a final Participants' Housing Support Plan (serving as exit support plan)
- Case notes describing the circumstances of the discharge
- Complete an HMIS Exit
- Provide information to landlords about how they can contact the program again (if needed) and what kind of follow-up assistance may be available.

³ MTA-RRH programs are required to track and report any such denials to the CLIK FHPAP Advisory Committee at the next scheduled meeting.

⁴ MTA-RRH programs are required to track and report any such denials to the CLIK FHPAP Advisory Committee at the next scheduled meeting.

Termination does not bar the participant household from receiving FHPAP assistance at a later date for the same family or individual, as long as the household has not exceeded a total of 24 months of rental assistance within the past 36 months.

STA and MTA-RRH Staff Training

At a minimum, STA and MTA-RRH Program staff must be trained on the principles of Housing First, Progressive Engagement, Harm Reduction, Motivational Interviewing, and oriented to the basic program philosophy of RRH. In addition, Housing Identification staff must be trained on Fair Housing, Housing Identification, Landlord Tenant Rights and Responsibilities, and other core competencies as well as the wider array of housing assistance available within a community.

CLIK FHPAP STA and MTA-RRH Forms

All CLIK FHPAP STA and MTA-RRH programs will develop and use the following forms:

- Participant Agreement
- Rental Assistance / Landlord Agreement
- Housing Stabilization Action Plan
- Rent Reasonableness Worksheet / Rentometer
- Participant Contribution to Rent Worksheet
- Housing Habitability Inspection Checklist (HUD)
- Lead Paint Information Form
- Housing Support Plan
- STA/MTA-RRH Reassessment
- Exit Notice

Participant Agreement

Purpose. Establish a shared understanding with participants for roles and responsibilities of program and participants in the RRH program.

Key Components. Participation Agreements must include:

- Clear overview of program, its intended duration and services. This will include a roster/description of services offered (case management, home visits, goal planning, housing stability services).
- Comprehensive list of items that will lead to program exit. This list should NOT include behavioral expectations of participants beyond personal and staff safety (i.e. no sobriety or participation in service requirements). Programs may not add to the list below without approval of CLIK FHPAP Advisory Committee:
 - Violence toward another program participant, staff, animals, or your landlord
 - Threats of violence toward program staff and agency animals
 - Behavior in unit that threatens the safety of program staff or neighbors making it unsafe for staff to conduct home visits
 - Participant no longer chooses to utilize the support of the program and requests to be exited
 - Participant is stable in housing and no longer needs program support
 - Participant is no longer eligible for services
 - Participant has been served for the maximum length of time permitted by our program
 - Inability to find agreeable housing within 6 months
 - Participant refuses or is not available for recertification
 - Participant is not responsive to contact attempts for at least 30 days and is not making progress to goals at recertification
- Signatures of both participant and RRH program committing to the agreement

Rental Assistance / Landlord Agreement

Purpose. Establish trust and a shared understanding of responsibilities with landlords or property owners that rent to FHPAP participants.

Key Components. Rental Assistance / Landlord Agreements must include:

- Language that clarifies that the participant is the lease holder, that they will pay their portion of rent to landlord/property owner directly, and that the FHPAP program assumes NO LIABILITY for the renter's performance under the terms of the rental contract.
- Basic information and shared expectations, which may include:
 - Name, address, lead contact, email, phone of FHPAP provider
 - Name, address, lead contact, email, phone of landlord/property owner
 - Participant Name
 - Property Address
 - Move-in date
 - Total rent amount
 - Tenant rent responsibility
 - Projected FHPAP program rental assistance amount
 - Expected start date of assistance
 - Expected length of service
- Agreement components, which may include:
 - Landlord/Property Owner responsibilities
 - Complete a W-9 prior to the issuance of rental assistance
 - Provide FHPAP staff with a copy of any notice given to the tenant (notices of lease violations or notice to vacate)
 - Make a reasonable accommodation, if applicable, for people with disabilities when an accommodation is necessary to insure equal access to the rental dwelling, its amenities, services and programs. Reasonable accommodations include changes to the building, grounds or an individual unit and changes to policies, practices and procedures.
 - FHPAP Program Responsibilities
 - Meet regularly with the participant
 - Pay rental assistance directly to the property owner/landlord according to the terms of the lease
 - Provide notice to the property owner/manager of changes in the rental assistance amounts or termination of service
- Indication of how agreement will terminate. Example "if/when the participant moves out of the unit, the lease terminates, or the participant is exited from our program".
- Signature/date of both FHPAP staff and Property owner/landlord

Housing Stabilization Action Plan

Purpose. Identify participant preferences and current strengths/barriers; and develop a concrete plan to identify the action steps participants and FHPAP staff will take to quickly seek and secure stable housing.

Key Components. Housing Stabilization Action Plans should include:

- **Participant's housing search goals**—Qualities the participant desires for their housing, including:
 - Location of unit
 - Desired city(ies)
 - Proximity to public transportation
 - Proximity to employment or higher education
 - School District (if school age children are in household)
 - Cost of unit
 - Size of unit
 - Amenities

- Etc
- **Current Strengths**—The participant and staff will create a roster of current strengths that will aid their ability to seek and secure desired housing.
- **Current Barriers**—The participant and staff will create a roster of current barriers that are inhibiting access to desired housing. Consider organizing barriers under the following categories:
 - Housing history
 - Criminal history
 - Credit history
 - Employment/income
 - Tenancy information
 - Relationships
 - Other
- **Concrete action steps**—The participant and staff will identify (in the participant’s words) specific steps (for both participant and staff) that are needed to address barriers and find/secure housing. These steps should be specific, achievable, and have specific due dates.

Rent Reasonableness Worksheet / Rentometer

Purpose. Determine if the rent being requested for the unit or room is reasonable to rates being charged for non-assisted market rate units.

Key Components. The rent reasonableness of the unit can be evaluated by one of the following approved methods:

- Use of Rentometer; <https://www.rentometer.com/>
- Evaluation of three unit rents in the area

Participant Contribution to Rent Worksheet

Purpose. Determine appropriate amount participants will contribute toward rent.

Key Components. Participant Contribution to Rent Worksheet must include:

- Date of form completion/update
- Participant name, staff name, date housed
- Participant monthly income
- Calculation for 50% of participant income
- Monthly rent of unit
- Amount of participant contribution to rent. If less than 50% of participant income, reason must be provided by staff and approved (signed) by FHPAP program supervisor

Housing Habitability Inspection Checklist (HUD)

Purpose. Ensure that the unit a participant secures is safe and up to basic housing standards.

Key Components. FHPAP programs will use the HUD Habitability Inspection checklist form.

Lead Paint Information Form

Purpose. Ensure that participants are aware of risks of lead paint and steps that they can take to recognize symptoms of lead poisoning and to ensure that their property owner is providing a safe living environment.

Key Components. FHPAP programs will use the Kootasca Lead Paint Information form.

Housing Support Plan

Purpose. Assist participants in identifying housing stability goals and concrete action steps to obtain housing and work towards independence. The Housing Support Plan should be:

- **Client-centered**—empowering participants to direct their own path
- **Promote accountability**—for both the participant and staff

- Housing stability focused--specifically addressing the housing stability crises that caused the participant's homelessness

Key Components. Many programs already have housing support plans developed within their organizations and may use what is existing. Some qualities to consider in a housing support plan include:

- Participant's desired outcome—Participants should be encouraged to envision what successful completion of the program will look like (what are their hopes and dreams?).
- Goal oriented—In the participant's words, set a few (no more than 4) measurable goals that will help the participant reach the outcomes they have envisioned.
- Categorize each goal—to ensure clarity for RRH staff and participant, identify the area of focus for each goal. The categories for this may include:
 - Tenancy supports
 - Basic living and social skills
 - Employment supports
 - Financial assistance and money management
 - Health care
 - Crisis prevention and management
- Concrete action steps—for each goal, identify (in the participant's words) specific steps that are needed to reach the goal
- Set due dates /targets—for each goal, identify timelines and due dates for completing steps and reaching goals. These can adjust over time, but will promote accountability and give purpose to RRH staff check in meetings.

STA/MTA-RRH Reassessment Form

Purpose. A form/process conducted with participant every month (STA) or three months (MTA-RRH) from the date originally housed that will assess and update progress of participant in order to determine whether or to what level continuation of the FHPAP program is needed.

Key Components. The STA/MTA-RRH Reassessment Form will include:

- Date of reassessment
- Name of participant and FHPAP staff
- Change in household (including names of new/exiting members and date of household change)
- Current rent/utilities, participant contribution, and FHPAP rental assistance amounts
- Current monthly income (noting if changed and date changed)
 - Note, supporting documents needed
- Tenant's concerns regarding housing stability
- FHPAP staff's concern regarding housing stability
- Updated FHPAP Prevention Targeting Tool or VISPDAT score (if conducted)
- Recertification determination (must have signature of program supervisor). Determination options include:
 - Discharge (must also complete RRH exit form)
 - Indication that participant's needs have been met
 - Indication that participant's needs have not been met
 - Continue services for next month (STA) or up to 3 months (MTA-RRH)
 - Indicate proposed changes to rental assistance/participant contributions to rent
 - Indicate level of services
 - Crisis-level
 - Weekly
 - Monthly
 - Other
 - Goals for next 1-3 months (what will be different as a result of another 1-3 months of service?)

Exit Notice

Purpose. Provide documentation and transparency to participant and program for ending FHPAP services and assistance.

Key Components. The Exit Notice will include:

- Date of notice
- Participant and staff names
- Date of exit
- Reason for exit. Options include (case notes should include explanations for whichever option is selected below):
 - Participant is stable and connected to community resources.
 - Participant has received services for the maximum program period (24 months).
 - Participant has demonstrated clear desire to not participate in program services, as demonstrated by:
 - The participant is absent from their assisted unit for more than 90 consecutive days;
 - The Participant has communicated, in writing or with third party witness, their intent to leave the program.
 - Participant is no longer eligible
 - The participant is utilizing duplicate subsidies (Public Housing, Section 8, Section 202, Section 811, Section 221, Section 236, Section 514, Section 515)
- Steps participants can take to appeal decision (process completed within FHPAP program) and/or file a grievance (process completed by FHPAP Grantee and Advisory Committee).
- The Exit Notice should be accompanied by:
 - Participants' Housing Stability Plan
 - Summary of services provided
 - Case notes describing the circumstances of the discharge

FHPAP and Coordinated Entry

All CLIK FHPAP subgrantees are expected to participate in the Northeast Minnesota Continuum of Care Coordinated Entry System (CES).

CES Participation

Participation in CES is defined as the following:

- FHPAP subgrantees must adhere to the written program standards for client eligibility and enrollment determination outlined in this document. An additional criteria may only be created with the approval of the CLIK FHPAP Advisory and must be shared with Northeast Minnesota CoC Coordinated Entry.
- FHPAP Short-term Assistance and Medium-term Assistance/Rapid Rehousing subgrantees must communicate project vacancies (bed and/or unit) to the CES waitlist manager
- Persons experiencing a housing crisis must access FHPAP homeless prevention services and assistance using CES defined access points
- FHPAP subgrantees must enroll only those clients screened or referred according to the CES designated screening and referral strategy
- FHPAP subgrantees must participate in the CoC's Coordinated Assessment planning and management activities as established by CoC leadership

FHPAP Documentation, Data and File Management

Timely and accurate documentation of FHPAP programs is vital to maintaining compliance and remaining in good standing with our funder (Minnesota Housing). The CLIK FHPAP Advisory will ensure that support is provided to each subgrantee to ensure that they are able to perform. Subgrantees that repeatedly fail to perform with the policies and procedures listed below will be subject to corrective action plans and (if needed) reallocations.

File Management

FHPAP subgrantees will maintain files for each program participant. Files must contain all items on the FHPAP Documentation Check-List (DAK file 9043).

Homelessness Verification

Homelessness documentation will need to be supplied or collected based upon the following hierarchy and order of priority.

- 1st – Source documents
- 2nd – Third party verification
- 3rd – Self-certification from the household

Income Verification

Income documentation will need to be supplied or collected based upon the following hierarchy and order of priority.

- 1st – Source documents
- 2nd – Third party verification
- 3rd – Self-certification from the household

Source documents include (but are not limited to):

- Pay stubs or wage statements
- Any other income statements (earned or unearned) which might include: VA Disability income, Unemployment, etc.
- Bank statements (as available)
- Social Security award notice
- Child support payment record
- General Assistance or TANF letter

Third party verification would be collected directly from the employer, social security administration, public assistance agency or financial institution. To conduct third party verifications, the household must sign a release form that authorizes the third party to release the required information.

Self-declaration from the individual household or family should only be used if source documents cannot be supplied and attempts to collect third party verification are unsuccessful. Acceptable self-declaration may include:

- Completion of a self-declaration form or a signed written statement from the head of household **and** household member if the income/asset pertains directly to that member. If the member is under age 18, they will not be required to sign.
- Written record on the intake worker's attempts to obtain third-party verification.

Household income includes all sources of income (for all members in the household including minors) and it also includes assets (for all members in the household).

Invoicing and Reporting

Invoice and reporting schedules are outlined in each vendor contract. Invoices, reports and HMIS data need to be reconciled and consistent.

Verbal and Written Reports to the CLIK FHPAP Advisory Committee

Sub-grantees are expected to attend monthly FHPAP Advisory Committee/Workgroup meetings. On a monthly basis, sub-grantees will be responsible for providing verbal program updates, including case consultation and case presentation. On

a quarterly basis (by the 15th day of the month after which the quarter ends), subgrantees will submit financial and outcome reports and will be available to answer questions from the Grantee and Advisory Committee.

HMIS

All FHPAP programs must enter data in HMIS. Each HMIS user must be licensed and trained. Licenses are valid for 12 months. Agencies may determine data entry management methods depending on their capacity and model. For example, data entry may be included in the duties of each case manager, or one person may be responsible for agency-wide data entry.

Licensing requirements

- Local Service Agreement with local CoC (sent to CoC and ICA)
- Agency Agreement with ICA (sent to ICA)
- Enter-data-as setup
- HMIS user training

Forms

See <http://www.hmismn.org/forms/FHPAP.php>

- Different forms for families and singles
- Entry and Exit forms

Data entry

- Entry date: Prevention screening date
- Complete data checks monthly
- Ideally, HMIS data is current to the day. At minimum, each month's HMIS data must be entered by the end of the first week of a new month so that monthly reports are accurate and current.

Data Quality

All FHPAP subgrantees are expected to conduct regular data quality reports and will respond quickly to correct errors as they occur. The CLIK FHPAP has established a standard performance measure for subgrantees that **98%** of data will be complete and accurate during regular data checks. Subgrantees that repeatedly fail to meet this standard may be subject to corrective action plans and (if needed) reallocations.

HMIS System Administrator Staff Contact information

The Institute for Community Alliance is the system administration for Minnesota's HMIS. The following individual is assigned as the primary support for the CLIK FHPAP region.

Drew Klinkert, System Administrator
 Drew.klinkert@icalliances.org
 218.606.2639

Appeals and Grievances

All CLIK FHPAP participants must be provided the opportunity to present written or oral objections before a person other than the person who approved the termination decision. Appeals will be made to the program director of the FHPAP subgrantee. Grievances will be filed with the Grantee and will require review and response from the CLIK FHPAP Advisory Committee using the KOOTASCA Grievance Form.

Equity policies

The CLIK FHPAP Advisory Committee is committed to pursuing equity in efforts to prevent and end homelessness. As part of this effort, CLIK FHPAP Advisory, Grantee, and sub-grantees will take the following steps:

- The CLIK FHPAP Advisory will develop reports to review system-level and provider-level HMIS data by race, ethnicity, income on at least a quarterly basis.
- FHPAP project applicants and sub-grantees will be selected (in part) based upon the representation of populations who are disparately impacted by homelessness in their staff and board composition.
- Targeting criteria will be developed on an annual basis to ensure that FHPAP resources are going to populations disparately affected by homelessness.
- All new policies and protocol will be developed using a lens that asks how the policy/protocol will impact (including unintended consequences) equity.
- All CLIK FHPAP homeless programs (services and assistance) will be made available to individuals and families without regard to race, gender, actual or perceived sexual orientation, gender identity, or marital status.
- For data collection purposes, FHPAP subgrantees may not require information about racial status, sexual orientation or gender identity to determine eligibility FHPAP services. Participants may provider voluntary self-identification of race, sexual orientation or gender identity to help inform client choice in housing placement.
- All direct service FHPAP staff will participate in required equity training at least annually.
- The CLIK FHPAP Advisory Committee will work with neighboring Tribal partners to ensure that a training(s) on Tribal sovereignty and historical trauma is made available for subgrantees and Advisory members at least annually.
- All direct service staff and assessors will be instructed to remember that people may change their pronouns without changing their name, appearance, or gender identity. Staff will be instructed to make pronouns an optional part of introductions or check-ins. A gender neutral or gender inclusive pronoun is a pronoun which does not associate a gender with the individual who is being discussed.

Coordination with schools/childhood education

All FHPAP subgrantees that serve households with children will be expected to comply with the following policies:

- Identify staff who have primary responsibility for connections to school and childhood education.
- Ensure that all homeless families are informed of the McKinney Vento Act to ensure that their children are able to maintain enrollment in school.
- Advocate for families with their school district to ensure that transportation is arranged (as needed).
- Help families to resolve any barriers that are contributing to the school attendance issues (as needed—STA/MTA-RRH only).
- Assist families in developing education related goals for all family members when completing Housing Goal Plans. (STA/MTA-RRH only)
- Ensure that all family members are connected to relevant educational resources in the community.
- Encourage and assist families with children ages 3-5 to apply for the Head Start Program and provide referrals to agencies that offer Head Start.

Connection to mainstream benefits

Each FHPAP subgrantee is expected to have strategies in place to support households who are in need of homeless prevention and homeless assistance with connecting to mainstream resources. These strategies may include: providing transportation; conducting outreach to known locations of unsheltered households, feeding programs, shelters, and other homeless facilities; co-locating mainstream eligibility workers in homeless prevention and assistance programs; providing multilingual services, ensuring staff are trained in SOAR or that your program has a direct connection/referral to SOAR staff in partner counties or agencies. FHPAP MTA-RRH providers will be evaluated (in part) by the change in income (earned and unearned) of program participants.

Connection to workforce supports

All FHPAP subgrantees are expected to assist participants in connecting to employment support resources that might help to increase income and self-sufficiency. Subgrantees must either have employment support staff or programs within their agency or have active relationships with workforce centers and other employment support agencies for participant referrals. FHPAP MTA-RRH providers will be evaluated (in part) by the change in income (earned and unearned) of program participants.

Required Meetings

All subgrantees are required to attend the following meetings:

| Meeting Name | Meeting Frequency | Minimum attendance | Who should attend |
|---|---|--------------------|------------------------------------|
| <p>CLIK Housing Issues Advisory Committee (FHPAP Advisory) This Committee is composed of grantees and non-grantees who are interested in issues related to homelessness in CLIK counties. This committee provides system-wide planning for all areas of preventing and ending homelessness (including: homeless prevention, homeless assistance, and rapid rehousing). This committee serves as the official FHPAP Advisory Committee and makes all formal decisions for FHPAP.</p> | <p>Quarterly 2nd Thursday of month</p> | 70% | At least one agency representative |
| <p>Local Housing Issues Advisory Committees There are local HIAC committees in Itasca, Koochiching, and Lake/Cook (combined). These committees meet on a monthly basis (10 times per year). The purpose of these committees is to improve networking and planning of the local homeless response system in order to inform CLIK planning.</p> | <p>Itasca County – Monthly on the 4th Tuesday</p> <p>Koochiching County Monthly on the 3rd Tuesday</p> <p>Lake/Cook Counties Bi-Monthly on 4th Friday</p> | 70% | At least one agency representative |
| <p>Northeast Minnesota Continuum of Care The Northeast Minnesota Continuum of Care (http://www.neminnesotacontinuumofcare.org/) is a planning body that covers the entire CLIK region plus Carlton and Aitkin counties. It is a comprehensive planning body that is required by HUD in order to receive and compete for HUD-CoC resources. It strives to be the comprehensive planning body for the full continuum of models needed to prevent and end homelessness.</p> | <p>Monthly 4th Tuesday of month</p> | 50% | At least one agency representative |

Appendix

CLIK FHPAP Home Visit Safety Procedures

CLIK FHPAP cannot control, and is not responsible for, the conditions at a participant's home or other location. CLIK FHPAP cannot control, and is not responsible for, the actions of a participant, a participant's family members, or other third parties that FHPAP staff may encounter during a home visit. FHPAP staff are encouraged to use their best judgment to protect themselves when meeting with participants. The following are procedures that have been adopted by the CLIK FHPAP Advisory Committee. All RRH programs will ensure that their programs (at a minimum) adhere to, train, and remind staff of these procedures.

Trust Your Instincts

- If persons FHPAP staff encounter at their workplace make staff uncomfortable, they will discuss the situation with an appropriate person and plan staff response.
- It is expected that FHPAP staff will always keep safety a top priority.
- FHPAP staff will inform their supervisor of safety concerns as soon as possible.
- FHPAP staff are not required to follow through with any home visit if they have concern for their personal safety. Explore alternative arrangements.
- FHPAP staff will listen to and act on their intuition. Leave any situation in which staff feel unsafe or threatened. It's better to be safe and risk a little embarrassment, than to stay in an uncomfortable environment that may be unsafe. Make an excuse to leave the situation. Seek help.

Plan Ahead

- When scheduling visits, FHPAP staff will be trained to consider:
 - The area
 - The situation
 - Their "gut" instinct.
- If possible, FHPAP staff will ensure there is adequate assessment of the home environment prior to undertaking a home visit.
- FHPAP staff will gather appropriate information that includes identification of the possible risks in the home environment.
- FHPAP staff will contact participants ahead to assure correct address, directions and presence of participant and/or other family members. Ask if there are animals present. If yes, consider asking the participant to secure animals before your arrival.
- FHPAP staff will leave schedule information with office and call in at specified times.
- FHPAP staff will get to know the area, particularly the safe areas, around participants' homes.
- FHPAP staff will carry only minimal cash and limit other items to an amount that is easy to carry.
- FHPAP staff will dress for function and mobility.
 - Dress conservatively with comfortable shoes.
 - Avoid wearing earrings or other accessories that could be grasped or pulled.
- FHPAP staff will wear their cell phone on their body, instead of keeping it in a purse or briefcase.
- FHPAP staff will consider carrying a noise making device.
- FHPAP staff will not give participants personal phone numbers.
- FHPAP staff will keep vehicles in good repair, full of gas and emergency equipment.
- FHPAP staff will look into their car before entering it, and always lock it when leaving or traveling.

Approaching the Home

- FHPAP staff will park in well-lighted, easy exit areas, preferably right in front of the home.
- FHPAP staff will keep in mind weather conditions, snow, icy sidewalks or roads, rain etc.
- FHPAP staff will not leave personal items, including ID, visible in their car.
- FHPAP staff will carefully examine the area, including neighbors, activity and indicators of crime.

- Look for signs of animals.
- FHPAP staff will carry your keys in their hand when traveling to and from the car. Otherwise, keep hands as free as possible.
- FHPAP staff will avoid groups or individuals loitering. Look for other entrances. If a group or individual appears to be hostile, walk away and reschedule.
- FHPAP staff will walk with a confident posture, and maintain a professional attitude.
- FHPAP staff will listen for sounds of fighting or disturbances before knocking.
- When the door is answered, FHPAP staff will decide if you will enter or invite the participant outside.

In the Home

- FHPAP staff will always try to leave an exit route or situate themselves between the exit and the participant.
- FHPAP staff will keep alert to activities in the home, others present, and exits available.
- FHPAP staff will maintain focus on the business at hand, while retaining attention to safety at all times.
- FHPAP staff will leave your shoes on if possible. If a confrontation arises, you need to be able to leave in a hurry.
- FHPAP staff will pay particular attention to the participant's protectiveness relating to certain rooms in the house.
- FHPAP staff will maintain awareness of other people in the home and those that come and go.
- If the participant has firearms and carries a gun, or keeps one close and FHPAP staff feel unsafe; FHPAP staff will leave or voice concerns and discuss something that will make staff feel safe.
- FHPAP staff will try to recognize the first signs of a change in your participant's behavior or the behavior of others in the home.
- FHPAP staff will use professional and social skills as needed to deal with any persons in the home, including managing angry people.
- FHPAP staff will ensure that all incidents are reported promptly and that accurate record keeping exists.
- If there are pets in the home that are unfamiliar to FHPAP staff, staff will request the family to secure the pet during the home visit.

Leaving the Home

- FHPAP staff will collect all belongings, and keep your keys in your hand.
- FHPAP staff will stay in the present.
- FHPAP staff will always check in and around your vehicle before entering it.
- FHPAP staff will watch for cars following them as they leave. Do not stop if requested.
- **TRUST YOUR INSTINCTS!**

What is Suspicious?

- Anything that seems out of the ordinary to you.
- Listen to your inner voice.

"We intuitively evaluate people all the time, quite attentively, but they only get to our conscious attention when there is reason. Thus, when something does call out to us, we ought to pay attention."

Gavin DeBecker –
The Gift of Fear- Survival Signals that Protect Us from Violence

Handling a Tight Situation

- FHPAP staff will watch the person's body language, including shaking or clenching fists, or a change in posture. He or she may be ready to do something physical.
- If a participant is quietly looking off into space after a period of venting, he or she may be considering taking action.
- If participants are delusional and believe that they are being threatened, attempt to increase their feelings of safety.
- Do not argue and try to convince delusional participants that their thinking is irrational.
- If participants have dementia, FHPAP staff will aim to anticipate their needs and avoid unfamiliar situations.
- FHPAP staff will allow about four times the usual personal space between yourself and the participant and refrain from touching the participant.

- FHPAP staff will never promise something you cannot deliver.

Participant Safety

- If a participant is getting frustrated by requests, the assessment process, etc., FHPAP staff will stop making demands and try changing the conversation or invite the participant to sit quietly.
- FHPAP staff will speak slowly and calmly, be assertive without challenging. Be polite and positive.
- FHPAP staff will repeat your purpose, check your watch and say you need to call your office or something else to divert attention.
- FHPAP staff will not tolerate rude or hostile behavior. Leave.
- If someone is following behind staff or in an elevator or stairwell with staff, FHPAP staff will look them in the face and ask them a question or make small talk, if appropriate.
- Physical resistance or force should be directed toward an attacker's vulnerabilities.
- FHPAP staff will know their strengths and weaknesses.
- FHPAP staff will practice ahead of time what you would do or say in a tight situation.
- FHPAP staff will receive formal training in de-escalation and self-defense.

Self-Protection Devices and Techniques include, but are not limited to, the following:

- Screech alarms
- Whistles
- Large and/or sharp key rings
- Your voice
- Cellular phone
- Call 911

Characteristics of Violent Behavior

- Verbal attacks on staff or others,
- Threats of physical attack against staff or others.
- Actual physical violence.

The Causes of Violent Behavior are Wide-Ranging and Include:

- Depression
- Paranoia
- Medications
- Confusion/Delirium
- Agitation

Verification of Homeless Status Eligibility

Documentation will need to be supplied or collected based upon the following hierarchy and order of priority.

- 1st – Third party documentation
- 2nd – Observation by the intake worker
- 3rd – Self-declaration from the individual or family seeking assistance

Acceptable evidence of third party documentation includes:

- Records contained in an HMIS database; or
- Comparable database used by victim service or legal service providers;
- Written observations by an outreach worker of the conditions where the individual or family was living;
- A referral from a publicly or privately operated shelter;
- Discharge paperwork or written/oral referral from a social worker, case manager, or other appropriate official of an institution stating the beginning and end dates of the time residing in the institution.
 - All oral statements must be recorded by the intake worker

Observation by the intake worker:

- If the intake worker can access HMIS or a comparable database (which retains an auditable history of all entries including the person who entered the data, the date of entry, and any changes made) to establish their homeless status.

Self-declaration from the individual household or family will include:

- completion of the self-declaration form **and**
- Written record on the intake worker's attempts to obtain third-party verification.