

**House-ability Program  
Written Policies and Procedures  
Updated August 2017**

**PROGRAMMATIC**

**Eligibility**

To be considered for the House-ability Program, a family must utilize the Dane County Coordinated Entry system. The only eligibility criteria to be used for entry into the House-ability Program are homeless status and disability. At no time shall a family be screened out of the program for any of the following:

- income (no income or too little)
- substance use (active use or history of use)
- criminal background
- history of domestic violence

1. Family with at least one adult and one minor child in the household.
2. Families must meet the HUD definition of Chronically Homeless, as defined by the following:

Chronically homeless means: (1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who: (i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility; (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

We do not discriminate against households due to religion, a religious belief, age, race, gender identity, sexual orientation or any other identifying characteristic.

## Documentation Requirements

Program participant files must contain documentation of the family's homelessness and disability. Each category of homelessness requires specific written documentation. Please see below for what is required for each category and the order or priority for documentation.

### Category 1.1 and 1.2

1. A written referral by another housing or service provider
2. A printed record from HMIS or a comparable database used by a victim service or legal service provider
3. A written observation by an outreach worker of the conditions where the family was living
4. A written certification of the head of household seeking assistance.

### Category 1.3

1. Discharge paperwork, written or oral referral from social worker, case manager or other appropriate staff of the institution that states the beginning and end dates of stay
2. A written record of attempting to obtain the information above and a written self-certification from the head of household seeking services that they are exiting an institution where they resided for 90 days or less.

In order to meet criteria for this definition, there must be documentation that the head of household met Category 1.1 or 1.2 definition of homelessness prior to entrance to institution. (See documentation requirements above.)

### Category 4

1. If the family was served by a victim service provider:
  - a. Documentation of the family's oral statement that the family was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault or stalking or other dangerous or life threatening conditions that relate to violence
  - b. Lacked the resources or support networks necessary to obtain other permanent housing
  - c. Had not identified other subsequent housing
2. If the family was served by an organization other than a victim service provider, documentation must include the 3 points above AND
  - a. Written certification by the head of household that the statement is true and completed AND
  - b. Written observation of the worker or a written referral by a housing or service provider, legal assistance provider, social worker, health care provider, law enforcement agency, pastoral counselor, or any other organization from whom the program participant had sought assistance for domestic violence, dating violence, sexual assault, or stalking.

\*documentation should include the minimum information needed to satisfy the requirement, do NOT obtain documentation if it puts the family's safety at risk.

### **Program Paperwork**

1. Participants will receive and program file will include a contract outlining their rights and responsibilities.
2. Participants will receive and program file will include a copy of the grievance procedure.
3. Sign applicable releases of information.
4. Give head of household a lead based paint pamphlet and have them sign form of receipt.

### **Rent Payments**

Program participants pay 30% of their adjusted gross income in rent to YWCA Madison.

Program staff must document income of household in the following way:

1. Income form completed by program staff
2. Source document of assets and/or deductions held by program participant and income received before date of evaluation
3. If source documentation unavailable, written statement by third party or the written certification of program staff of the oral verification of relevant third party of income received over most recent 3 month period
4. If source documents and 3<sup>rd</sup> party verification unavailable, written certification of program participant of income expected to receive in the next 3 months

### **Grievance Procedure**

If a program participant has a concern with YWCA staff or services provided through the House-ability program, the following procedure should be used:

1. Discuss concern with the Housing First Program Coordinator. If the problem cannot be resolved informally and verbally, place the concern in writing. A written response will be provided within one week. If the concern is with the Housing First Program Coordinator, move directly to step 2.
2. If the concern remains unresolved, forward written documentation of the concern to the YWCA Housing First Programs Manager and they will assist you to investigate and resolve the concern.
3. If the concern still remains unresolved, you may forward your concern in writing to the YWCA CEO, and they will make a final decision on how it will be resolved.

### **Grievance Procedure for the House-ability Program (The Road Home)**

If a program participant has a concern with The Road Home staff, the following grievance procedure should be used:

1. If comfortable, discuss the concern with your Case Manager.
2. If you are unable to discuss the concern with your Case Manager, or are unable to come to a resolution, put your concern in writing to The Road Home Program

Director. The Program Director will discuss it with you and with the staff member involved.

3. If your concern is not resolved to your satisfaction, or if you have a concern about the Program Director, you may put your concern in writing to The Road Home Executive Director. The Executive Director will discuss it with you and with the staff member involved.
4. If your concern is not resolved to your satisfaction, or if you have a concern about the Executive Director, you may put your concern in writing to the chair of The Road Home program committee. Any staff member will forward the letter to the chair of The Road Home program committee. The program committee will make a final decision about how the matter will be resolved.

### **Grievance Procedure for the House-ability Program (The Salvation Army)**

If a program participant has a concern with The Salvation Army staff, the following grievance procedure should be used:

The appeal process of The Salvation Army, 630 East Washington Avenue, Madison, Wisconsin, 53703 allows for a fair hearing.

A client/guest or applicant for services at The Salvation Army in Madison, Wisconsin may appeal a decision of the staff by contacting the staff member's supervisor in writing and requesting a meeting. The staff member, supervisor and client/applicant shall meet and a written decision shall be forwarded to the client/applicant and staff member within 72 hours of the meeting. If the client/applicant decides his/her right to access of service has been unfairly denied the client/applicant may make a final appeal in writing to the Dane County Coordinator of The Salvation Army who will review the case and make a final determination within 72 hours and notify the client/applicant in writing of the decision.

The services in dispute will be suspended during the appeal process. At the discretion of the Dane County Coordinator the services in dispute may be reinstated during the appeal process. If the supervisor is the Dane County Coordinator, the Coordinator's decision as supervisor will be the final determination.

### **Termination Process**

Terminating a family's assistance from the House-ability Program should only occur in rare and severe cases. A decision to terminate assistance shall never be made based on a participant's income (loss of income or failure to increase income) or due to being a victim of domestic violence. Staff at YWCA Madison, The Road Home, and The Salvation Army must have a discussion before making a decision to terminate assistance. All possible alternatives must be explored before terminating assistance. If it has been decided that termination is the only option, use the following process:

1. Provide program participant a letter indicating termination of assistance that states the reason for termination, including facts, sources of the facts, the right to review their file, and evidence on which the decision is based. Provide a copy of the program contract with sections highlighted that are relevant to the decision. In addition, provide a copy of the grievance procedure.
2. Participants can request and will have the right to have the case reviewed by staff that did not make the decision to terminate assistance. Participants may present their objections orally or in writing.
3. When a participant completes the review process staff will provide written notice of the final decision to the program participant.

### **Housing Location Process**

Most times participants will enter the program and staff will need to work with the family to locate housing. In these instances, staff must have a conversation with the family about housing location. Please take into consideration where children attend school or daycare, location of employment, access to transportation, and other family needs.

Program staff will follow CDA's policy when assigning number of bedrooms to households.

One bedroom will be for two people within the household, except in the following situations:

- \*People of different generations, persons of the opposite sex (other than spouses, and children under age 6) and unrelated adults will be allocated different bedrooms.
- \*Foster children will be included in determining unit size if they will be in the unit for more than six months.
- \*Space may be provided for a child who is away at school but who lives with the family during school recesses.
- \*Space will not be provided for a family member, other than a spouse or co-head, who will be absent most of the time, such as a member who is away in the military.
- \*Live-in aides will be allocated a separate bedroom. No additional bedrooms are provided for the attendant's family.

### **Lease/sub-lease**

YWCA Madison needs to sign the lease due to receiving Leasing dollars from HUD. When YWCA Madison is listed as a tenant and signs the lease, a sub-lease should be put in place between YWCA Madison and the program participant.

### **Voluntary Services**

Program participants will all be offered case management services, but will not be required to participate. Case management staff must offer participants a wide array of services offered. These may include, but are not limited to: developing an individualized housing/service plan, assistance with obtaining and maintaining housing, counseling, employment referrals, education, referral and coordination of services, accessing mainstream benefits, and coordinating with schools. If a participant declines services, program staff must continue to

reach out to participant to try to engage with them. At no time shall a participant be terminated from the House-ability Program for failure to participate in supportive services or failure to make progress on a service plan.

### **Conflict of Interest Policy**

When a potential conflict of interest arises, it will be disclosed in writing and will include the person's name, position, phone number and address. It will also detail the nature of the conflict of interest (perceived, apparent, or actual). The letter will be dated and will request action to address the conflict of interest.

YWCA Madison, The Road Home, and The Salvation Army will not make rent reasonableness and housing quality inspections on properties owned by the recipient or subrecipients or any other related entities. Additionally, no covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of YWCA Madison, The Road Home, or The Salvation Army and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, 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, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.

### **SUBRECIPIENT**

#### **Memorandum of Understanding**

YWCA Madison will initiate a Memorandum of Understanding (MOU) with The Road Home and The Salvation Army for each grant period. All agencies will maintain a signed copy in their files.

#### **Monitoring**

YWCA Madison, as the recipient, should conduct an on-site monitoring of the subrecipients, The Road Home and The Salvation Army, at least once per year. Monitoring is carried out primarily by the Housing First Programs Manager and Chief Financial Officer of YWCA Madison.

During the visit, YWCA Madison staff will identify all the areas that a formal monitoring would cover, and provides an initial, informal assessment of the adequacy of the subrecipient's systems, procedures, and records.

The monitoring will take place on an agreed-upon day and time by each agency. YWCA Madison will send a written letter detailing areas of improvement to each subrecipient within 30 days of the monitoring visit. Subrecipients will then have 60 days to provide a response on any action taken.

Monitoring areas include:

1. Eligibility- documenting homeless status and disability verification
2. Support Services- assessments, service plan, services being provided
3. Housing- lead based paint, habitability checklist
4. Client Payments- verify client income, annual review, rent calculated properly
5. Use of program income and Cash Match- track and document match, MOU for in-kind services
6. Program Policies- client participating in policy-making, grievance procedure. Discharge planning, termination of assistance, confidentiality and privacy restrictions, conflict of interest, Drug-free work place, Rules/Responsibilities for clients and staff, non-discrimination and equal opportunity, anti-lobbying, educational assurances, accurate notes,
7. Fiscal Management- internal controls, cash management, budget, procurement, audits, accounting controls, match, property asset controls, not paying rent over FMR

## **FINANCIAL**

### **Allowable costs**

Leasing dollars are to be spent directly for rent costs. We can only draw down from eLOCCS three days prior to rent being paid.

Support services dollars are to be spent for case management time and housing/counseling/travel and transportation services.

Admin dollars are to be spent on eligible admin costs (see 24 CFR part 578.59) for options.

### **Receiving funds**

YWCA Madison will request funds from eLOCCS at least quarterly and will send prompt payments to the The Road Home and The Salvation Army after receiving documents of dollars spent.