

**MIAMI-DADE COUNTY HOMELESS TRUST  
CONTINUUM OF CARE  
HOMELESSNESS PREVENTION PROGRAM STANDARDS**

**I. CoC HOMELESSNESS PREVENTION ASSISTANCE**

**A. Homeless Prevention in General**

1. Homeless Prevention (HP) within the Miami-Dade County Continuum of Care (CoC) is comprised of housing relocation and stabilization services and short-and/or medium-term rental or mortgage assistance as necessary to prevent the household from moving to an emergency shelter, a place not meant for human habitation, or another location described in paragraph (1) of HUD's homeless definition. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.
2. HP is provided through a network of local community-based agencies and supported by federal Emergency Solution Grant (ESG) funds allocated to Entitlement Jurisdictions located in Miami-Dade, the federal Emergency Food and Shelter Board Program (EFSP), the VA Supportive Services for Veteran Families (SSVF) Program, TANF Homeless Prevention, Miami-Dade County 1% Food & Beverage (F&B) tax proceeds administered by the Miami Dade County Homeless Trust (Trust), who is the lead CoC agency, Florida Department of Children and Families funds, local jurisdictions' SHIP funds and/or other funding sources.

**B. Area of HP Service Provision**

CoC HP is offered throughout Miami-Dade County and access to such assistance is coordinated through the Miami-Dade CoC's Coordinated Entry System as described below. Certain funding sources limit provision of assistance within certain geographic boundaries (i.g. an Entitlement Jurisdiction's ESG allocation may only be expended within the Entitlement Jurisdiction's geographic boundaries) or to certain sub-populations (i.e. Veterans).

**C. Area-Wide System Coordination of Resources to Address HP Needs**

1. Federal regulations governing ESG funds require area-wide systems coordination (24 CFR § 576.400). ESG Entitlement Jurisdictions are required to consult with the local CoC in determining how to allocate ESG funds each program year; developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds.

To ensure coordinated use of HP resources and compliance with § 576.400, local ESG Entitlement Jurisdictions have agreed that:

- a. The CoC will review homeless prevention needs, establish priorities for prevention assistance and coordinate allocation of available prevention funds toward these priorities within the boundaries of the CoC in collaboration with ESG Entitlement Jurisdictions, other HP funders and the Trust's CoC Subcommittee.

- b. To ensure compliance with § 576.400(e), these CoC HP Standards of Care shall serve as the written standards for providing ESG assistance that are required of ESG Entitlement Jurisdictions and shall be made part of ESG grant agreements entered into with local providers.
  - c. In collaboration with the ESG Entitlement Jurisdictions, the CoC will establish performance outcome standards and perform evaluation of HP assistance funded with ESG and by or through the Trust.
2. These HP Standards of Care also apply to all HP assistance funded by or through the Trust.
  3. The CoC encourages other funders of HP assistance to adopt these Standards of Care to the extent allowed under their governing laws and incorporate them into homeless prevention funding agreements to ensure that all County residents seeking HP assistance receive the same level of service and care regardless of provider or source of financial support.

## II. DEFINITIONS FOR HP ELIGIBILITY

### A. Homeless Categories Eligible for HP

Individual or family who meets one of the following categories of HUD's Homeless Definition at §576.2, AND has an annual income below 30% of median family income for the area is eligible for ESG HP assistance:

- Category 2 (Imminent Risk of Homelessness)\*
- Category 3 (Homeless Under Other Federal Statutes)
- Category 4 (Fleeing/Attempting to Flee Domestic Violence, Labor or Sex Trafficking; and not living in a place described in Category 1)\*

\*The definition includes the requirement that individuals and families have no other residence AND lack the resources and support networks to obtain other permanent housing.

### B. "At Risk of Homelessness" Eligibility under ESG

An individual or family is considered at risk of homelessness to receive ESG HP assistance if they meet one of the following categories:

Category 2\*\*: The individual or family household:

1. Has income of 30% or less of annual median income **AND**
2. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; **AND**
3. Meets ONE of the following conditions:
  - a. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; **OR**
  - b. Is doubled up, and not listed on the lease because of economic hardship; **OR**
  - c. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; **OR**

- d. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; **OR**
- e. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; **OR**
- f. Is exiting a publicly funded institution or system of care; **OR**
- g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in this Consolidated Plan.

Category 3: The individual is a child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.

The individual is an unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

Category 4:

\*\*The definition includes the requirement that individuals and families lack sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in Category 1 of the homeless definition.

### III. GUIDING CoC PRINCIPLES

The following principles have been adopted for all CoC-funded or coordinated housing and services:

#### A. Housing First

The CoC is committed to incorporating a Housing First approach across its programs, as highlighted in the Homeless Plan and Coordinated Entry System Policies and Procedures. Housing First is a system orientation and approach that works to connect people as quickly as possible to permanent housing and the care and support they need to stabilize and improve their quality of life. The primary goals are to help people obtain permanent housing as quickly as possible, increase their self-sufficiency, and remain stably housed.

A Housing First orientation recognizes that everyone can achieve stability and in permanent housing, with the right supports, and that housing stability provides the foundation that people need to improve their health and well-being. Although an individual experiencing homelessness may benefit from supportive services such as mental health or substance abuse counseling, participation in these services is not a prerequisite to access permanent housing or a condition of maintaining it. Research has shown that even when participation in services is not required as a condition of tenancy in supportive housing, tenants still participate at high rates.

A system-wide Housing First approach includes: working to identify and prioritize people with the highest needs and vulnerabilities; taking a permanent housing-focused approach to crisis response services, including street outreach and shelter; moving people as

quickly as possible into permanent housing; and providing and/or connecting tenants with voluntary social services to help tenants stabilize and maintain their housing.

### **C. Prioritization**

There are not enough homeless prevention resources to serve everyone who needs assistance. The prioritization strategy is driven by the need to prevent large inflow to crisis assistance system by targeting ESG homeless prevention assistance to the people most likely to enter street or sheltered homelessness. The CoC will enhance connections to other resources and providers for people who do not meet criteria for homeless prevention assistance by equipping homeless prevention assessors/intake staff with up-to-date information about other available resources to ensure that people who cannot be served with Homeless Prevention funds are aware of other options for support. No less than annually we will review system data and processes to ensure the system response advances equity.

During eviction moratoriums tenants who have been notified in writing that their right to occupy their current housing or living situation will be terminated, received a three-day notice or other documentation of late rent from the landlord can be assisted.

Priority will be given to households who are:

- at or below 30% AMI.
- meets one of the following categories from the list of HUD McKinney-Vento regulations (used for ESG) list of factors for being at-risk of homelessness:
  - Notified in writing that their right to occupy their current housing or living situation will be terminated
  - Lives in a hotel or motel (not paid for by government or charity)
  - Is exiting an institution or system of care
- meets at least one of the following of HUD's At-Risk of Homelessness criteria related to the likeliness that the household will enter shelter or the street without assistance
  - household has previously experienced homelessness (HMIS)
  - household has any prior evictions (formal actions taken by the landlord that resulted in loss of housing)
  - households fleeing Domestic Violence, labor or sex trafficking
- meets at least one factor related to the urgency of the situation
  - households with eviction proceedings underway
  - vulnerability to illness/death in the time of COVID – CDC definition of high-risk includes older adults and those with specific underlying health conditions
  - households with high levels of rent and utility arrears and large sums that need to be paid immediately in order to keep housing
  - loss of income

### **D. Client Focused**

#### **1. Trauma-Informed Service Provision**

Trauma-Informed service provision takes into account knowledge about trauma — its impact, interpersonal dynamic, and paths to recovery — and incorporates this knowledge into all aspects of service delivery.



Trauma Informed Service provision:

- Integrates an understanding of trauma, substance abuse and mental illness throughout the program.
- Reviews service policies and procedures to ensure prevention of re-traumatization.
- Involves consumers in designing/evaluating services.
- Sees trauma as a defining and organizing experience that can shape survivors' sense of self and others.
- Creates a collaborative relationship between providers and consumers, and place priority on consumer safety, choice and control.
- Focuses on empowerment and emphasize strengths.

## **2. Strength-Based Client-Centered Case Management**

Strength-based client-centered case management includes strategies to identify and build on clients' strengths and goals rather than focusing primarily on their problem areas. Staff, in partnership with clients, tap into clients' motivation and identify clients' skills and capacities, existing resources, challenges, and the supports they need to meet their short- and long-term goals. This approach also recognizes the importance of drawing from the strengths of an individual's family and community when developing a plan.

Strengths-based approaches employ a holistic approach to working with clients, recognizing their intrinsic value, and working with the individual's strengths and capacities in addition to his/her unmet needs. When employed together, client-centered case management and strength-based approaches aim to reduce stigmatization and marginalization experienced by clients by promoting their self-worth and value, and targeting the spectrum of challenges causing conflict in their lives rather than focusing exclusively on individual problems.

## **3. Motivational Interviewing**

Motivational Interviewing (MI) is defined as a client-centered, directive method for enhancing intrinsic motivation to change by exploring and resolving ambivalence. This approach contrasts to approaches that would directly inform the client that the person has a problem and needs to change; offers direct advice or prescribes solutions to the problem without the person's permission or without actively encouraging the person to make his or her own choices; uses an authoritative/expert stance leaving the client in a passive role; and/or imposes a diagnostic label.

## **4. Harm Reduction Model**

The Harm Reduction philosophy prioritizes housing stability among persons who have experienced homelessness and who may be facing disabilities. Although recovery from mental health and substance abuse disorders is always the goal, harm reduction acknowledges that persons may be at different places along the continuum of behavior change. Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of tenants' lives, where tenants are engaged in non-judgmental communication regarding drug and alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.

Housing First harm reduction focuses on helping tenants stay housed by assisting with the management of problems that interfere with their ability to meet the obligations of tenancy, such as paying rent. Tenants are also encouraged to explore obstacles toward their goals in an open and non-judgmental atmosphere where they can contemplate the consequences and benefits of receiving services to address their special needs. Support service staff are not to alienate tenants or cause them to begin a dishonest game of hiding drug use, psychiatric symptoms, etc. Like any other tenant, tenants receiving services using this philosophy must still pay rent and comply with the terms of their lease.

#### **IV. COORDINATED ENTRY AND HMIS PARTICIPATION**

##### **A. Access through CoC Coordinated Entry System**

1. The CoC has established a Coordinated Entry System (CES) by which to access CoC assistance. The CES coordinates outreach and access points, assessment of need, referral/placement for assistance from providers of homeless prevention, diversion, emergency shelter, rapid re-housing assistance, permanent supportive housing and mainstream services and housing providers.
2. Access to CoC HP is made available through the CoC CES Helpline, through 13 county-wide Community Action Agency sites, a Coordinated Victims Assistance Center, Health Care for Homeless Veteran's office, and during a pandemic or other disasters, receipt of applications may be automated. In the event that applications are automated, the CoC will ensure it is widely advertised and can accommodate persons who need assistance completing the application. All access points, with the exception of DV and Veteran access points, use the CoC Homeless Prevention Assessment tool found in HMIS. DV access points and the VA have developed unique assessment tools in consultation with the CoC. All persons seeking HP will be assessed for Diversion as part of the standard assessment.
3. Walk-in access points must accept and process applications for prevention assistance (except for certain HP programs such as SSVF with their own walk-in access points) and must include locations offering mainstream services that address housing, health, social services, employment, and education.

##### **B. HMIS**

1. All providers of HP must participate in the Miami-Dade County Homeless Trust HMIS under an HMIS Participation Agreement and are subject to the CoC HMIS Standards, Policies and Procedures, which include consent to disclose and confidentiality requirements.
2. Providers must have separate HMIS projects for HP and RRH. If a provider has been awarded separate funding for more than one HP project, each must be maintained separately in HMIS.
3. All providers of HP must complete the CoC's Homeless Prevention Assessment tool found in HMIS.
4. All persons requesting homeless prevention assistance must be entered into the corresponding HMIS project to comply with local, state and federal data requirements

surrounding homeless services. This will include, but not be limited to: adding basic client demographics; adding additional household members; adding when release of information is granted and expiration date; adding program entry, interim contacts, and exits; completing HUD CoC and ESG data elements that accompany the entry, exit and interim contacts; and making referrals to third parties.

## **V. HOUSING STABILIZATION CASE MANAGEMENT AND ACCESS TO MAINSTREAM RESOURCES**

### **A. Housing Stabilization Case Planning**

1. HP participants must meet with a HP case manager not less than once per month to assist the program participant in ensuring long-term housing stability (and be documented in client case file and HMIS).
2. The HP case manager must develop, in conjunction with the participant, an individualized housing and service plan to assist the program participant to maintain permanent housing after the ESG assistance ends, taking into account all relevant considerations such as the program participant's current or expected income and expenses, other public or private assistance for with the program participant will be eligible and likely to receive, and the relative affordability of available housing in the area. The Housing Stabilization Case Plan must document the household's needs and type of assistance to be provided, the amount and duration of assistance and, in the event of rental assistance, the percentage that the household will be required to pay towards rent.
3. Case management includes the following types of contact: home visits, office visits, meeting in a location in the community, or phone calls (at least one visit per month must be in person). Meeting times, place and frequency should be mutually agreed upon by both the participant and case manager.

### **B. Housing Stability and Case Management Services**

HP providers must provide individual housing stabilization and/or case management services to project participants, which include:

1. **Housing Stability Services** to assist participants in locating and obtaining suitable, affordable permanent housing, including:
  - Assessment of housing barriers, needs, and preferences.
  - Development of an action plan for locating housing.
  - Housing search.
  - Outreach to and negotiation with landlords or property owners.
  - Tenant counseling.
  - Assessment of housing for compliance with project type requirements for habitability, lead-based paint and rent reasonableness.
  - Assistance with submitting rental applications.
  - Understanding lease agreements.
  - Arranging for utilities.
  - Making moving arrangements.



- Assuring participants have the basics at move-in, including simple furnishings, mattresses, and cooking utensils like pots and pans.
2. **Case Management Services**, including assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for participants who have obtained and maintained permanent housing through the homelessness prevention or rapid rehousing project by:
    - Developing, in conjunction with the participant, an individualized housing and service plan with a path to permanent housing stability.
    - Developing, securing, and coordinating services.
    - Obtaining federal, state, and local benefits.
    - Monitoring and evaluating project participants' progress towards goals.
    - Providing information about and referrals to other providers.
    - Conducting evaluations at least every three months to determine ongoing project eligibility.

### **C. Access to Mainstream Resources**

1. Every provider that is funded through the CoC or ESG programs is expected to coordinate with and access mainstream and other targeted homeless resources on behalf of their participants.
2. Prevention providers should assess and assist participants with obtaining any mainstream resource for which they may be eligible for including: TANF, Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Medicare, Federally Qualified Health plan (Affordable Care ACT), CHIP, SSI/SSDI, Workforce Investment funds, and Welfare-to-Work.

## **VI. ESG PREVENTION ASSISTANCE**

ESG homelessness prevention is housing relocation and stabilization services and short- and/or medium- term rental assistance as necessary to prevent the household from moving to an emergency shelter, a place not meant for human habitation, or another location described in paragraph (1) of HUD's homeless definition.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

### **A. Eligibility and Re-Evaluation**

#### **1. Eligibility**

To be eligible for ESG homeless prevention assistance, the household must:

- a. Meet the HUD definition of "at risk of homelessness" as defined above or Categories 2, 3 or 4 of HUD's definition of homeless; and
- b. Have household income that is less than 30% of area median income (AMI)\*. Annual income determinations and required documentation shall be governed by 24 CFR 5.609.

*\* Note: May serve households at or below 50% AMI at initial application when using ESG-CV funds, depending on date of substantial amendment review.*

**2. Priority for ESG HP Assistance**

- a. Priority for ESG HP assistance has been established by limiting assistance to households with third party verification of being at risk of homelessness (e.g. court filed eviction notice).
- b. Persons eligible for a VAWA emergency transfer shall be given priority for assistance as set forth under 24 CFR § 576.409(d).

**3. Re-Evaluation of Eligibility**

Not less than once every three months, HP providers must re-evaluate program participants' eligibility and the types and amounts of assistance the program participant needs. Each re-evaluation of eligibility must determine and document that the program participant:

- a. does not have an annual income that exceeds 30% AMI as established by HUD; and
- b. lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

**B. Determination of HP Assistance**

- 1. A Housing Stabilization Case Plan will document the household's needs and type of assistance to be provided, the amount and duration of assistance and, in the event of rental assistance, the percentage that the household will be required to pay towards rent.
- 2. The Plan must first determine if the household can remain in their current housing or if they should relocate to regain stability. The planning process should evaluate whether prevention assistance will allow the household to successfully remain in their current unit based on their current or reasonably projected income after assistance ends. If relocation is warranted, the household must select a unit where the housing costs (rent and utilities) are affordable to their current or reasonably projected income.
- 3. In the case of HP rental assistance, the household is expected to pay a percentage of the rent, however, assistance and percentage of household share shall be individually determined, based on need and circumstances.

**C. Types and Amounts of Assistance**

HP assistance may be provided to the extent that the assistance is necessary to help the participating household to regain housing stability in their current permanent housing or move to more affordable permanent housing to achieve stability in that housing to avoid homelessness.

**1. Forms of Cash Assistance (this does not include HUD waivers)**

Form of Assistance	Limit on Amount of Assistance	Additional Requirements
Security Deposit & Last Month's Rent	<u>Security Deposits:</u> Assistance an amount equal to no more than two months' rent.	

	<p><u>Last Month's Rent:</u> Last month's rent may be paid to owner at the time that owner is paid the security deposit and first month's rent. Assistance may not exceed one month's rent and such amount is included in calculating the total rental assistance provided to participant (no more than 24 months within a 3-year period).</p>	
Utilities (excluding phone and cable) and Utility Deposits	<p>HUD Regs: ESG may pay up to 24 months of utility payments per service, including up to 6 months of utility in arrears per service.</p> <ul style="list-style-type: none"> <li>• Utilities in arrears, maximum of 6 months of utilities due per utility, which counts toward the 24-months of assistance permitted.</li> </ul>	Partial payment of a utility bill is equal to one month.
Application Fees	Application fee in the amount charged to all applicants may be paid.	
Moving & Storage	Available to households moving to a new unit. Provides assistance with reasonable moving or storage costs. Allowable costs include truck rental, hiring a moving company, short-term storage fees for up to three months provided that such fees accrue after the date the participant begins to receive assistance under 24 CFR 576.105(b) and before the participant moves into permanent housing. Storage fees in arrears is not permitted.	
Rent in Arrears	One-time payment for rental arrears for up to 6 months, including any late fees on the arrears.	
Rent Assistance	<p>No more than 24 months of rent* assistance during any 3-year period, including rent in arrears payments.</p> <p>If the household needs additional assistance in the future and a new housing need arise, further assistance may be provided until the household has reached 24 months.</p> <p><b><u>*Note: ESG-CV funds may be limited to 12 months, depending on date of substantial amendment review.</u></b></p>	<ul style="list-style-type: none"> <li>• Rental Assistance Plan must assess whether the households are able to afford the apartment according to the current or reasonably projected income. Households may need to relocate to more affordable housing to receive assistance.</li> <li>• Rent may not exceed HUD FMR and must be reasonable compared to</li> </ul>

		<p>similar units in the neighborhood. Rent includes any fees (other than late fees and pet fees) and any utility allowance for utilities that the tenant is responsible for paying.</p> <ul style="list-style-type: none"> <li>• Unit is subject to habitability standards inspection.</li> <li>• Written lease for unit that complies with 24 CFR 576.106(g).</li> <li>• Rent Assistance Agreement that complies with requirements found in 24 CFR 576.106(e) and (f).</li> </ul>
Legal Assistance	<p>Tenant defense in legal evictions filed in Miami-Dade County.</p> <p>Advocacy to prevent evictions or address issues of habitability.</p>	

The maximum length of time a program participant may receive rental assistance through ESG is 24 months during any 3-year period, included rent in arrears payments. If the household needs additional assistance in the future and a new housing need arise, further assistance may be provided until the household has reached 24 months.

## 2. Determining Amount of Rental Assistance and Household Contribution

The recommended assistance levels in the chart below provides the percentages of the rent that the participant is expected to pay and percentage of the rent that the HP program is expected to pay. These percentages can be adjusted based on need. For example, if a household is under threat of eviction if the total amount owed is not paid for rent in arrears, then the case manager can assist with the full rent amount if the tenant is not able to pay a percentage.

Month	First Month	Second Month	Third Month*	Last Month*
Tenant share	0%	0%	50%	0%
Program Share	100%	100%	50%	100%
Rent for 1BR	910	910	910	910
Program pays	\$910	\$910	\$455	\$910
Tenant pays	\$0	\$0	\$455	\$0

\*If the landlord is not requesting the last month's rent, the last month's rent can be paid on the third month, and the third month's rent can be applied to the fourth month.

## VII. PREVENTION ASSISTANCE AVAILABLE THROUGH OTHER PROGRAMS

There are multiple funders of HP assistance. The Trust, on behalf of the CoC, will partner with and/or coordinates the resources of HP funders to provide HP assistance through the CoC network of HP providers. Each funding source establishes its own eligibility criteria, priorities for assistance, and type and amount of assistance.

#### **A. Emergency Food and Shelter Program**

The federal Emergency Food and Shelter Program (EFSP) Is a need-based program administered by the United Way of Miami-Dade County and governed by the EFSP Local Board. Eligibility criteria and assistance available is established by the local EFSP Board. Allowable uses of and limitations on EFSP funds are set forth in In the Emergency Food and Shelter National Board Program Phase 35 Responsibilities and Requirements Manual (and subsequent parts). In addition to assistance to avoid eviction, EFSP may provide mortgage assistance to prevent foreclosure.

#### **B. VA SSVF**

1. SSVF HP financial assistance is available to eligible Veteran families who are imminently at-risk of becoming literally homeless (e.g., entering an emergency shelter or place not meant for human habitation) **but for** SSVF assistance. “Veteran family,” means that the person to be served is either (a) a Veteran; or (b) a member of a family in which the head of household, or the spouse of the head of household, is a Veteran.
2. SSVF is not an eviction prevention program. It is intended to prevent Veterans and their families from losing all housing and ending up in emergency shelter or on the street. Some Veterans who apply for SSVF Homelessness Prevention assistance may be losing their housing, but they have another safe and appropriate housing option – including temporary options – where they can stay while they work to obtain their own housing. Or, an applicant may have another resource they can use to maintain current housing or obtain new housing. Such Veterans are not eligible for SSVF Homelessness Prevention assistance.
3. Local SSVF grantees must establish eligibility and targeting strategies for screening applicant households for homelessness prevention assistance (VA-approved homelessness prevention targeting strategy). This eligibility screening and targeting is documented using a standardized VA homelessness prevention (HP) screening form, which is based off of a VA- approved eligibility criteria and targeting threshold score. The purpose of the screening tool is to target SSVF resources to those who are most at-risk of becoming homeless. Furthermore, the eligibility criteria and targeting threshold score serve as a tool for prioritizing households eligible for homelessness prevention services when capacity for providing such is limited and also supports grantees in determining the intensity of homelessness prevention services that an eligible household may receive. SSVF grantees may have additional eligibility criteria apart from VA eligibility criteria stated above if those criteria have been approved by VA.

### **C. TANF Homeless Prevention**

1. TANF HP funds may assist eligible families to avoid homelessness through the following supports: 1) past due rent or mortgage payments, not to exceed four months of rent or mortgage payment; and 2) past due utility bills, not to exceed four months in arrears for electric, gas, water, and sewer only. The family's housing emergency must be the result of a financial or other crisis.
2. To be eligible for assistance under this grant, families must reside in Florida; have at least one household member who is a United States citizen or a lawful permanent resident; have a minor child living in the household full-time; and have a household income less than two-hundred percent (200%) of the federal poverty level as annually [published](#) by the U.S. Department of Health and Human Services (HHS). A minor child means a child under the age of eighteen (18); or if age eighteen (18), but not yet nineteen (19), is attending high school, a General Education Development (GED) program, a trade school, or other career training program on a full-time basis. A minor child cannot be married or divorced. The adult who applies for the grant assistance with the CoC must be either the parent or guardian of the minor child residing in the household.
3. TANF HP providers must develop a written case plan in conjunction with the family and conduct mandatory case management for the family. The family's case plan shall set forth all of the costs that will be covered by the grant, as well as the total dollar amount of assistance to be provided to the family. The case plan shall spell out the family's goal for housing stability, the anticipated date the case plan will be completed, the HP provider's schedule for monitoring the family's housing stability following the cessation of grant assistance, whether the family was able to avoid becoming homeless, and whether the family remained in permanent housing.
4. Assisted families must be tracked and monitored for at least 12 months after the last assistance is provided to the family. The goal for the homelessness prevention program is to enable at least 85% of the families assisted to remain in their homeless and avoid becoming homeless during the ensuing year.

### **D. SHIP**

1. Through partnerships with local governments receiving allocation of State Housing Initiatives Program (SHIP Administrators), state funds are made available for HP assistance. SHIP funds can serve renter households that are in need of assistance for: 1) security and utility deposit assistance; 2) eviction prevention not to exceed 6 months' rent; and/or 3) rent subsidies for up to 12 months. To be eligible for rent subsidies, the household must be very low-income and include at least one adult who is a person with special needs as defined in the 2015 Florida Statutes S. 420.0004 or homeless as defined in S. 420.621.
2. Local SHIP strategy encourages that households with very-low income receive all three types of rental assistance (deposits, eviction prevention, and rent subsidies) because they have the greatest need and fewest resources.
3. The Trust coordinates the award of SHIP funds to HP providers on behalf of the local SHIP administrators, who contract directly with the providers.

## **E. Homeless Trust Food and Beverage (F&B)**

1. Trust-administered F&B funds are directed toward HP for households at imminent risk of entering the homeless system. F&B HP services include rental and utility assistance, case management, and referral to legal services. F&B also funds the Prevention Helpline. Helpline staff collaborate with other CoC and ESG funded Homeless Prevention providers, including the Emergency Food and Shelter Program (EFSP) web-based clearinghouse to ensure that no duplication of payment occurs within the categories of rent, mortgage or utility assistance.
2. In addition, the Trust awards F&B tax proceeds as matching funds for awards from other HP funders.

## **VIII. NON-DISCRIMINATION IN PROVISION OF SERVICES**

1. There shall be no discrimination in the provision of prevention assistance on the basis of race, color, gender, sexual orientation, disability, religion, or national origin. age, race, color, creed, religion, sex, sexual orientation, gender identity, gender expression, handicap, national origin, ancestry, familial status, marital status, pregnancy, veteran status or source of income in the provision of homeless prevention assistance. No religious practice or affiliation requirement shall be imposed upon participants. Providers shall demonstrate sensitivity to participants' primary language and cultural background.
2. CoC and ESG Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of state, local and Federal civil rights laws as specified at 24 CFR.5.105(a), including, but not limited to the following:
  - Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
  - Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance;
  - Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance; and
  - Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance. Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.
  - HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

## **IX. TERMINATION AND GRIEVANCE**

### **A. Termination of Assistance**

1. HP providers must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
2. Termination of program participation does not bar further assistance at a later date to the same family or individual.

### **B. Grievance Process**

1. HP providers must comply with the CoC's adopted grievance procedure.