

ALAMEDA COUNTY
YOUTH HOMELESSNESS DEMONSTRATION PROGRAM (YHDP)

JOINT COMPONENT
TRANSITIONAL HOUSING—RAPID RE-HOUSING
(TH-RRH)

PROGRAM

MANUAL

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These written standards provide an overview of the expectations for the YHDP Joint-Component TH-RRH Project (hereafter referred to as the “program”) funded by the [Youth Homelessness Demonstration Program \(YHDP\)](#) in Alameda County. This program is part of the larger homeless response system in Alameda County. Please refer to [Alameda County Homelessness Response System Written Standards](#) for a comprehensive overview of that system. Unless otherwise indicated, these standards are consistent with and expand upon the system-wide standards governing TH and RRH programs. Where this program manual is silent, the System Written Standards apply.

This document includes the minimum requirements for the program, including:

- Eligible program participants.
- Referral, admission, and discharge processes for the program, including anticipated and maximum lengths of program enrollment.
- The scope of services and resources that programs are required to provide or otherwise refer participants to receive through other community partners.
- Required program coordination with other programs and partners, including benefits programs, health care, employment, and education.
- Policies, procedures, and forms for special YHDP flexibilities and other relevant services and resources.

Program Overview

The Joint-Component Transitional Housing - Rapid Re-Housing (TH-RRH) program combines two existing Continuum of Care (CoC) program components, Transitional Housing (TH) and Rapid Re-Housing (RRH), in a single project to provide young people with short-term housing coupled with short- to medium-term rental assistance and support to identify, move into, and transition to maintaining permanent housing on their own.

Purpose & Goals

The [Youth Action, A Way Home](#), Alameda County’s Coordinated Community Plan to prevent and end youth homelessness, identified that youth and young adults need more time and options while navigating housing insecurities and homelessness. They found that the traditional 2-year timeframe of Transitional Housing (TH) and Rapid Re-Housing (RRH) programs do not typically provide enough time for a young person to be ready to maintain their own permanent housing, especially given the local housing market.

This project was identified as critical to addressing youth homelessness in Alameda County because through the combination of the TH and RRH components, it can offer young people up to 5 years of supported housing and services to prepare them to successfully maintain permanent housing independently. It is intended to increase our systems capacity to provide necessary short- to medium-term crisis housing for youth and young adults who do not have many other options that feel safe, approachable, and accessible to them.

The ability to link this crisis intervention directly to longer-term housing supports using RRH is also essential in our community. While holistic supportive services are a necessary and vital factor in supporting youth experiencing homelessness, the ability to provide needed housing for youth experiencing homelessness continues to be a huge challenge for our community. It is critical for young

people experiencing homelessness to have access to safe and stable housing they are satisfied with in conjunction with needed services to transition out of survival mode and towards healthy and sustainable independence.

This program is intended to lead to improved mental health (decreased stress and anxiety) and help to build a stable foundation from which young people can focus on employment, education, wellness, and other personal goals. The stability and longevity of this TH-RRH housing will also allow young people to build savings and increase their financial literacy to support long-term financial stability. Both components of this project, TH and RRH, are designed to meet young people where they are in their housing journey and support them in increasing their income and building the necessary skills to obtain and maintain permanent housing.

Philosophy and Principles

TH-RRH programs utilize a person-centered, Housing First approach in which resources and services are tailored to the unique needs of each young person. Young people work in collaboration with their case worker to reach their individual housing stability and other goals. Both components of the program, TH and RRH, are also grounded in the practices of trauma-informed care, Positive Youth Development, and harm reduction. This program adheres to the following principles derived from the Housing First for Youth model¹:

- **A right to housing with no preconditions.** This project cannot require participants to be sober, abstinent, employed, in school, in treatment for any condition, or enrolled on services as a condition of being housed in TH or RRH. Further, services and the offer of support are tied to the young people, whether or not they are currently housed (e.g., the program may not exit a young person because they got evicted). Young people in the program are not required to accept services or other offers of support.
- **Youth choice, youth voice, and self-determination.** Young people are experts in their own experiences, needs, and lives. Young people in the program have full control over their lives, including when they may make choices that service providers would not choose for them. The service provider's job is to meet each young person where they are, work with them to reduce harm when possible, and support them in learning through the process of making choices and experiencing the positive and negative consequences of those choices. Note that this implementation of youth "choice" does not mean that anyone can and should do whatever they want whenever they want. Rather, providers should help set boundaries and help young people understand the boundaries of choice when considering consequences they do and do not want to face. Further, each young person's ideas, opinions, and knowledge should be a respected and be a leading contributor to program implementation and policy.
- **Positive Youth Development & wellness orientation.** Programming and supports are oriented around young people's assets, strengths, dreams, and hopes. Programming should support young people in building self-esteem, a positive sense of self, buy-in for working toward and achieving their own goals, and access to supports and opportunities that will allow them to pursue their personal interests and dreams. Further, the program embeds trauma-informed practices that recognize intersectionality, increase safety, decrease harm, and prevent re-traumatization.

¹ Please refer to these resources for more detail on the Housing First for Youth (HF4Y) model: [THIS is HF4Y Part 1: Program Model Guide](#) (The Homeless Hub) and [THIS is HF4Y Part 2: Operations Manual](#) (The Homeless Hub)

- **Individualized & youth-driven supports.** The program understands and respects that, once housed, each young person will want, need, and choose to participate in a unique type and level of support or services. The program promotes active engagement from case managers without coercing young people to accept that engagement or other services offered.
- **Social inclusion & community integration.** The housing offered to youth through this program should never stigmatize or isolate youth, nor should it force them to participate in a “community” they are not choosing for themselves (e.g., in a site-based setting). Service providers should consider how to offer individualized opportunities for social, cultural, and spiritual engagement, and staff should be equipped to explore if, when, and with which boundaries participants may want to connect or reconnect with natural supports and family in their lives.

As part of upholding a youth-centered and youth-driven approach, the program is also encouraged to use the YHDP special activity that permits employment of young people who are receiving services, including housing, from the program. Recipients that utilize this special YHDP activity must maintain documentation that discloses the nature of work that the youth does, and that the youth is not in a position that creates a conflict of interest. For more information and appropriate forms, see [Employing People Enrolled in Services](#) policy and procedures in Appendix A.

Program Description

This program provides young people with short-term housing coupled with short- to medium-term rental assistance and support in identifying, moving into, and transitioning to maintaining longer-term housing on their own. **Young people can begin either in the TH or the RRH component**, depending on the young person’s current level of needed support and their preference.

Regardless of where a youth begins the program, they will first receive crisis management and stabilization, followed by housing identification, then housing assistance (i.e., leasing and rental assistance). Additionally, case management and supportive services are offered throughout the course of their enrollment in the program. More details and guidelines for each of these program elements is provided in the [Program Guidelines & Documentation Requirements](#) section of this document.



Target Population

The target population for this project is all young people under the age of 25 who are homeless, at imminent risk of losing their housing, or fleeing violence (i.e., young people meeting HUD Category 1, 2, or 4 definitions of homelessness²). Particular consideration will be given to providing supports within the program specifically designed for young people who are pregnant and parenting, who are

² For more information regarding these definitions and determining the homelessness status of youth visit <https://files.hudexchange.info/resources/documents/Determining-Homeless-Status-of-Youth.pdf>

undocumented or a migrant, who have experienced labor or sexual exploitation, or who have been involved with the juvenile justice system or foster care system.

There are no minimum or maximum income limits when determining the initial eligibility of a household (income verification will only be conducted as part of determining the amount of rental assistance, see [Income Verification](#) on page 13). Programs shall not establish additional eligibility requirements beyond age and homelessness and those required by current or future funders. Declining a young person's admission into a program should be rare and occur only in limited situations (e.g., when a young person is in need of a higher level or more specialized care that can be better provided by another program. In these instances, the young person should be referred to the more appropriate program.³).

The program also follows Housing First principles regarding how participants are screened and enrolled. Potential participants cannot be screened out due to having too little or no income, an active or history of substance use disorder, a history of domestic violence, a criminal record (apart from any applicable state restrictions). Additionally, young people cannot be screened out due to belonging to or identifying with any group protected in the non-discrimination policy outlined in [Alameda County's Coordinated Entry Manual](#).

Referral and Enrollment

Both the TH and RRH components of the program participate in Alameda County's Coordinated Entry System (CES) to receive referrals and enroll participants in the program. Program providers must use the CoC-wide Prioritization Order for enrollment. The only documentation necessary to enroll in the program is proof of age and proof of homelessness status (see [Target Population](#), above). This program must align with [HUD recordkeeping requirements for demonstrating homelessness](#) for any young person enrolled in the program.

The TH Housing Component

The TH component of the program provides short- to medium-term crisis housing for young people with no other safe alternative. To do so, it uses leasing resources to provide up to 24 months of housing and supportive services designed to help participants successfully move to and sustain permanent housing. All participants in the TH program must have an occupancy or lease agreement for a specified term, which may be month-to-month. The lease must be automatically renewable upon expiration, except upon prior notice by either party, for up to a maximum of 24 months. TH units must also meet habitability standards (See [Habitability Standards](#) policy and documentation in Appendix A).

TH units are directly linked with RRH units so that all young people who enter the TH component are guaranteed entry to the RRH component upon exit from TH if the young person needs and wants ongoing support. A young person is supported in moving from TH to RRH whenever they say they are ready. Young people should not move from RRH to TH, except in rare instances (e.g., if they get evicted from a RRH unit and have nowhere else to stay).

³ Details on the coordinated entry assessment and prioritization process can be found with Alameda County's most recent coordinated entry policies available at <https://homelessness.acgov.org/coordinated-entry.page>.

The RRH Housing Component

The RRH component of the program provides young people with up to 36 months of rental assistance for housing in the community and supportive services. 24 months of rental assistance is guaranteed to all young people in the program. This can be extended for up to 36 months so long as the program documents the young person's eligibility for ongoing rental assistance (for more details on this and required documentation, see the [Additional Rental Assistance policy](#) in Appendix A). As stated above, a young person does not have to first be enrolled in the TH component of the program to be eligible for entry into the RRH component; however, if the young person enters first in the TH Housing Component and then remains in the program for the maximum length of time, participants may have a total of 60 months of housing support through the program.

All young people in the Rapid Rehousing program must have a signed lease in their name and all RRH units must be regularly inspected to ensure they meet habitability standards (See [Habitability Standards](#) policy and documentation in Appendix A). Both the young person and the program must pay rent/rental assistance directly to the landlord. Projects may not collect rent from participants for units using rental assistance.

Case Management

Case management is offered to participants throughout their enrollment in the program and is designed to assist in assessment, crisis management, stabilization, housing identification, housing assistance, and provision of and/or referral to needed supportive services. This is accomplished through creation and regular updating of a service plan and voluntary meetings between the young person and their case manager. The young person and the case manager will collaboratively identify goals for housing, education/employment, well-being, permanent connections, as well as any other areas the youth may identify; make plans towards achieving these goals; and monitor progress. Case management meetings should be approached as an opportunity to support the young person in skill development, problem solving, and working towards meeting their goals. More details about the case management process and service plan documentation are provided in the [Program Guidelines & Documentation Requirements](#) section of this document.

Case management meetings are held at times and locations (including virtual or remote options) that are best for the young person. Young people are not required to come into an office for case management meetings.

Supportive Services

An array of supportive services is also offered to participants throughout their enrollment in the program, and for up to 24 months after their last housing assistance payment. Services are designed to address needs around employment, education, well-being, permanent connections, legal supports, and other youth-identified needs to support young people in being able to maintain their own housing long-term and in alignment with the overarching goals of YHDP. This includes provision of and/or referral to additional supportive services specifically designed for young people who are pregnant and parenting, undocumented/migrant, who have experienced labor/sexual exploitation, or who have been impacted by the juvenile justice system or foster care system.

The full breadth of housing and services provided through this program are described in more detail in the [Scope of Housing Resources & Services](#) section of this document. Program providers must directly

provide, pay for, or make connections and referrals to all services listed in the [Supportive Services](#) section of Allowable Housing Resources & Services below.

Program Guidelines & Documentation Requirements

The following details expectations of program operations over the course of a young person's enrollment. Additional program details as well as the specific program policies and required documentation can be found in [Appendix A](#). Spending guidance for all program components is in [Appendix B](#).

Enrollment and Intake

Program staff should welcome young people to the program by holding an intentional space to get to know the young person and start building trust. This should happen at the young person's point of entry to the program and (if applicable) when they transition from TH to RRH. Minimum required documentation for enrollment should be collected (i.e., proof of age and homelessness status), but any other documentation needed to provide ongoing assistance or services (e.g., documentation necessary to access housing) can be obtained post-enrollment and should not interfere with program enrollment.

The intake and orientation to the program should include the following elements:

- Opportunity to get to know each other, become comfortable, and establish a safe space
- Inquire as to how the young person is feeling and their current situation
- Begin to explore the young person's goals
- Provide a verbal program overview as well as a welcome packet that outlines program services and supports and program and participant expectations
- Review the program documentation together and inquire about any additional support they may need to review and understand the program materials
- Check for the young person's understanding of the program
- Make an initial action plan with clear next steps (this does not need to be formal)
- Emphasize that the intake process can be completed over multiple sessions over the first 30 days and additional information can be shared as the young person is comfortable.

Assessment, Crisis Management & Stabilization

A young person's immediate needs are assessed at intake and throughout the first few case management sessions, as trust and rapport is built. Any immediate needs identified should be addressed as swiftly as possible to support initial stabilization. A complete intake and needs assessment is then conducted within the first few case management sessions. This should include assessing for eligibility and enrollment in other social services, including CalFresh, Medi-Cal, SSI/SSDI, General Assistance, and others as applicable. This initial assessment forms the basis for the service plan discussed below.

During this stage, case managers should also review program expectations and community guidelines with the young person to ensure the young person is clear on what is expected of them, what support they can expect from the program, and how to communicate with staff if they have questions or needs that are not being addressed.

Case Management & Supportive Services

Case management is offered consistently to all young people throughout the course of their time in the program. The level to which a young person engages in case management is at their discretion;

however, case managers and/or housing specialists (titles may differ; hereafter referred to as case managers) must regularly offer to meet with the young person at times and locations that are convenient to the young person to address their needs and develop and make progress on their service plan. At a minimum, HUD requires rapid rehousing projects to meet with a program participant not less than once per month, to assist the program participant in maintaining long-term housing stability.⁴ Therefore, case managers should seek to connect with the young person at least once each month and as part of the quarterly update to their service plan (see more details on service plan updates below); however, intensive case management services must be offered to all young people, with case management meetings offered weekly. It is up to each young person how much they would like to engage in case management and supportive services. A young person cannot be exited from the program solely for refusing case management or other services.

Communication

Case managers are generally expected to respond to a young person on their caseload within one business day, and the program must have and communicate to young people alternative contacts and resources in the event of a case manager being unavailable or a young person needing urgent assistance outside of the program's regular hours.

Home Visits

Home visits provide an opportunity to provide further case management and should be approached as an opportunity to support the young person in skill development, problem solving, and working towards meeting their goals. As with case management, home visits cannot be required beyond what is necessary for habitability inspections (See [Habitability Standards](#) policy and documentation in Appendix A) and must be scheduled at times that are best for the young person. With the exception of what is required for habitability inspections (See [Habitability Standards](#) policy and documentation in Appendix A), the young person has discretion as to what parts of their home are viewed during any home visit. If a landlord has expressed concerns, the case manager should work with the young person and the landlord to collaborate in order to address concerns and the landlord may enter the property in accordance with the lease agreement and State law.

Service Planning & Documentation

Case managers should develop voluntary service plans with participants and document all referrals made for services to address identified needs. Service planning begins at intake and focuses on identifying and transitioning the young person to the most appropriate permanent housing situation and supportive services.

The service plan document should serve as a roadmap to independent housing and personal growth for the young person. The document should be strengths-based and include goals and progress tracking for housing, education, employment, well-being, permanent connections, and personal growth. **The service plan should be reviewed and updated with the youth quarterly and as needed, with a full reassessment completed annually.**

Providers must keep records for all participants that document the assessed needs of the young person and outline the services provided in response. This should include evidence that, at a minimum, quarterly assessments of service needs were completed, and the service plan updated accordingly.

⁴ See CoC Interim Rule [§ 578.37\(a\)\(1\)\(ii\)\(F\)](#)

Supportive Services

Program providers must directly provide, pay for, or otherwise make connections and referrals to all of the following services in accordance with each young person's needs:

- Annual assessment of service needs
- Assistance with moving costs (this is allowable multiple times for each youth as needed)
- Case management
- Childcare
- Education Services
- Employment assistance and job training
- Housing search and counseling services
- Legal services
- Life skills training
- Mental health services
- Outpatient health services
- Substance abuse treatment services
- Transportation
- Utility deposits
- Direct provision of services
- Food (see the [Food Provision Policy](#) Appendix A)

In addition, there are some special YHDP flexibilities that require specific processes to be followed to demonstrate necessity to support the young person in obtaining and maintaining housing in order to justify using them; however, these should also be provided whenever needed:

- Security deposits (not to exceed 2 months of rent);
- The costs to pay for any damage to housing due to the action of a program participant.
- Household cleaning supplies.
- Housing start-up expenses (furniture, pots and pans, linens, toiletries, and other household goods, not to exceed \$300 in value per program participant).
- The one-time cost of purchasing a cellular phone and service for program participant use.
- The cost of internet in a program participant's unit.
- Payment of rental arrears (for up to 6 months of rent, including any late fees).
- Payment of utility arrears (for up to 6 months per service).
- Up to three months of utilities.
- Gas or mileage costs for a program participant's personal vehicle for trips to and from medical care, employment, childcare, or other program eligible services.
- Legal fees, including court fees, bail bonds, and required courses and equipment.

See [Appendix A](#) for details on how these regular or special activities are implemented in a standardized, HUD-compliant, consistent, and equitable way for each service participant, including applicable forms for documenting need for specific YHDP flexibilities. See [Appendix B](#) for eligible costs and spending guidance for each identified service.

Supportive services should continue to be provided to program participants for up to 24 months after the program participant exits homelessness, transitional housing or after the end of housing assistance.

Supportive Interventions: The program must provide supportive, equity-focused interventions to address behavioral or other challenges that may arise while a young person is in the program to support their continued successful participation in the program, aligned with the core principles outlined in this document. When implemented, these must be documented in a youth's service plan. These supportive interventions may include:

- One-on-one reflective check-in with case manager and/or trusted staff.
- Conflict mediation.
- Community Guidelines review and sign off:
 - Discuss and document clear expectations on the youth's behavior moving forward;
 - Document clear, supportive intervention steps (e.g., referral to stress management workshop, therapy, etc.); and,
 - Sign Community Guidelines (young person and staff).

Housing Identification

Ultimately, it is up to the program participant to select a housing unit in which to live and the people with which they will share that housing, if any. Typically, housing identified should be based on household size to ensure sustainability of the housing upon exit from the program. If the young person is interested in pursuing a shared housing situation, see the [Shared Housing](#) section below for more information on important requirements in these situations. Within the limits of the young person's anticipated income, program providers must help young people access units that are desirable and sustainable, i.e., that are in neighborhoods where they want to live, have access to transportation, are close to employment, and are safe. The program must provide each young person with multiple housing choices that are in alignment with the young person's housing desires and goals (e.g., neighborhood, amenities, etc.) within practical constraints, and continue to do so until a suitable unit is secured for the young person.

Housing identification efforts should be designed and implemented to actively recruit and retain landlords and property managers willing to rent to young people who may otherwise fail to pass typical tenant screening criteria.⁵

Housing identification services include:

- At enrollment or within 72 hours of enrollment, review and update of the young person's coordinated entry assessment of housing barriers, needs, and preferences.
- Development of an action plan for locating housing.
- Actively assisting young people with housing searches (i.e., identifying landlords, helping young people view apartments, etc.)
- Outreach to and negotiation with housing owners.
- Assisting young people with submitting rental applications and understanding leases.
- Assisting young people with obtaining utilities and making moving arrangements.
- Tenant counseling.
- Providing basic support to all landlords who lease to young people in the program.

⁵ See the [NAEH RRH Toolkit](#) for further guidance.

- Continual recruitment and retention of landlord partners and maintenance of a system to track unit vacancies, locations, characteristics, and costs.
- Exploring options such as shared housing and placements with family and friends to the degree to which it is safe and appropriate for a young person (See [Shared Housing Guidance](#) in Appendix B for more details).

Housing Requirements: Habitability Standards and Rent Reasonableness

Housing identified must comply with Habitability Standards, which requires inspection of the property within the first 30 days and at least once every 12 months during the period of housing assistance.

This is a special YHDP flexibility that provides a more flexible standard than the Housing Quality Standards in 24 CFR 578.75 that is typically required. To implement this special YHDP flexibility, programs must keep documentation of which standards are applied to the units and proof that the units complied with the standards before assistance is provided for every unit funded by YHDP. See [Habitability Standards Policy & Procedure](#) for more details on proper processes and forms for complying with meeting habitability standards for a unit.

Rent must be determined to be reasonable for any housing for which the program is providing rental assistance. This is done by comparing rent for the unit to receive rental assistance in relation to rents being charged for comparable unassisted units, taking into account the location, size, age, type, quality, amenities, facilities, housing services, utilities provided, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units.

To calculate rent reasonableness for a shared housing situation, the Fair Market Rent (FMR) for the shared housing is the lower of the FMR for the family unit size or the pro-rata share of the FMR for the shared housing unit size. The pro-rata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private space by the total number of bedrooms in the unit. For example, in the case of a single person household renting one room in a 4-bedroom house, the FMR used would be the lower of the 1-bedroom FMR or the pro-rata share of the 4-bedroom FMR (1/4 of the 4-bedroom FMR).

Lease Requirements

Each household being assisted with CoC Program tenant-based rental assistance must have their own separate lease with the property owner to be considered a separate household for the purposes of eligibility to receive rental assistance. To receive rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause, unless the case manager and young person have together determined that utilization of the YHDP flexibility for a shorter lease term is beneficial. To utilize this flexibility, See the [Minimum Lease Term Policy and Procedure](#) in Appendix A. All leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

Shared Housing

A variety of housing types may be assisted with CoC Program funds, including shared housing, as long as the housing meets the conditions set forth in the [CoC Program interim rule](#) and is consistent with the scope of the program.

Safety is one of the biggest concerns people have about sharing a housing unit. The living situation must be safe and comfortable for everyone.

Under the CoC Program interim rule, if you are going to house people in shared housing/roommate situations, there are certain requirements that must be met, and other considerations to keep in mind. First, HUD requires participants in a shared housing situation to have separate leases. This is a requirement designed to protect the tenant from facing eviction because of actions from the roommate. If this requirement is posing a barrier, please reach out to the Alameda County Youth Program Services Coordinator to assist in collaborating with HUD to explore possible flexibilities. Because each program participant will be required to have a separate lease, rental payments made on each program participant's behalf should be made separately to the landlord based upon each program participant's rent calculation and contribution.

Rental Assistance

Once housing is identified for a young person, rental assistance will be provided based on the young person's income and the RRH Rental Contribution Policy detailed below and the [Rental Assistance Spending Guidance](#) in Appendix B.

Income Verification & Budgeting

Income verification is necessary to determine the rental contribution via the rental calculator (See below for more details). Upon entry into the RRH component, the case manager should use at least two months' worth of paychecks to calculate the young person's average monthly income, as well as support the young person in developing a budget that reflects their current needs and anticipated future rent payments that will increase. The case manager must complete the Income Evaluation Form, as well as collect and maintain on file applicable source documents (wage statements, bank statements, etc.).

Income verification must then occur at least every 3 months prior to rent re-calculation. The case manager must complete the Income Evaluation Form, as well as collect and maintain on file applicable source documents for each income verification. See the [Income Verification Policy](#) in Appendix A for more details.

Budget Review & Significant Change in Status

A case manager must offer to review a young person's budget at least monthly to help determine whether the young person's income has decreased. If a young person has decreased income, they may request a new income verification and adjustment to their rent contribution before the regular verification is due.

A significant change in status is defined as an **unplanned*** life event that occurs outside of the household's control, significantly decreases their income, and causes significant hardship. Case managers can re-calculate the household's rent portion immediately if a significant change of status has occurred. This can include, **but is not limited to:**

1. Fleeing domestic violence or other threats of violence
2. Unemployment and delay in unemployment benefits
3. Major medical or psychiatric hospitalization of household or household's immediate family member

You can access the Rental Contribution Calculation Form and all other program forms at <https://drive.google.com/drive/folders/1bYQuenYT7Sn7TB6L013DGNT3pHUGyEYp>

4. Death of a child or immediate family member, or chosen family, as identified by the youth
5. Enrollment in a short-term vocational or educational program that will lead to increased earning potential at the end of the program (** this may be a planned event at the time of entry into the program*)
6. An unplanned event that the case manager deems significant enough in nature to determine a rent recalculation or payment plan would be appropriate. (*Note that the rationale for this must be clearly documented in the case notes.*)
7. Other circumstances as determined with participants, case managers, and program managers and recorded in case notes.

RRH Rental Contribution Policy

Rapid Re-Housing is a time-limited rental assistance program. Rental contributions will be based on a combination of the percentage of total rent owed and the young person's income, with rental contribution amounts increasing every 3 to 6 months. Young people may receive up to 36 months of rental assistance and 24 months of supportive services after their last rental assistance payment, but participation should be evaluated on an ongoing basis, and **young people should be exited when they are able to maintain housing without financial assistance and supportive services from the program.**

All rental contribution policies will be clearly communicated and an outline of the rental increase timeline will be provided to the young person when the program begins paying their subsidy. The young person should sign a copy of the RRH Rent Calculation Form and be given copies of their rent calculation, which should be logged in their file. If a household refuses to sign, attempts to remediate the concern with the young person and obtain the signature should be documented in the case notes. Each young person will also be provided with a copy of their rental contribution logs monthly. Notification for rental contribution increases will be provided to the young person at least 30 days prior to the increase taking effect. The following provides an outline of the anticipated timeline for rent increases and the corresponding percent of income caps:

Month of Rental Assistance from RRH	% of Rent Youth is Responsible for Paying	Max % of Youth's Take-home Income Dedicated to Rent
Months 1 – 3	0%	0%
Months 4 – 6	20%	5%
Months 7 – 12	40%	10%
Months 13 – 18	50%	20%
Months 19 – 24	60%	30%
Months 25 – 36	75%	40%

Case managers should use the [Rental Contribution Calculation Form](#) to calculate each youth's appropriate rental contribution. To calculate the young person's rental contribution, start by calculating what would be the percentage of rent owed by the young person based on the total amount of rent owed and the young person's length of the time in the program. Then calculate the maximum amount of the young person's take-home income that can be dedicated to rent based on the young person's length of time in the program. Then compare the two. If the young person's calculated rental contribution would exceed the maximum amount of their income that can be dedicated to rent, then the young person's rental contribution is the maximum amount of their income dedicated to rent, otherwise the young person's contribution is the calculated rental contribution.

At least every 3 months, the case manager should recalculate the household's rent using the RRH Rent Calculator. The household rent portion should increase at the percentage intervals listed above, and the young person should be exited once the maximum amount of their income that can be dedicated to rent is equal to or greater than the full amount of rent owed.

Utility Allowances

Utilities that are not included in the program participant's rent may be paid using rental assistance funds. Furthermore, all RRH programs are required to adhere to HUD's [Notice CPD-17-11: Determining a Program Participant's Rent Contribution, Occupancy Charge or Utility Reimbursement in the Continuum of Care \(CoC\) Program when the Program Participant is Responsible for the Utilities](#). Specifically, the CoC interim rule requires all RRH projects to calculate rent as the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities established by the local public housing authority for the area in which the housing is located.⁶⁷ Therefore, **if utilities are not included in a young person's rent, the rental calculation must incorporate the applicable utility allowance, and the young person must be reimbursed for any amount that the allowance exceeds the program participant's share of rent.** HUD's Notice CPD-17-11 linked above includes clear examples for how to calculate and pay utilities in cases where it is required.

Program Exit

YHDP-funded TH-RRH programs may offer housing in TH for a maximum of 24 months. During this time, the household should be working on and supported to find permanent housing that they will be able to move into and afford after they leave the program. This is likely to include using the RRH component of the program for a period of time, though other housing options may be explored.

YHDP-funded TH-RRH programs may offer housing through rental assistance in RRH for a maximum of 36 months (using specific policies listed in the policies document for anyone receiving more than 24 months of rental assistance), with up to 6 months of services after the last rental assistance payment (or up to 24 months of services after the last rental assistance payment using the policy listed in the policies document).

Continuation of Supportive Services after Program Exit

The program may continue providing supportive services to program participants for up to 24 months after the program participant exits homelessness, transitional housing or after the end of housing assistance if the program demonstrates: 1) the proposed length of extended services to be provided; 2) the method it will use to determine whether services are still necessary; and 3) how those services will result in self-sufficiency and ensure stable housing for the YHDP program participant. The program may continue providing supportive services to program participants for up to 36 months after the program participant exits homelessness, if the services are in connection with housing assistance, such as the Foster Youth to Independence initiative, or if the recipient can demonstrate that extended supportive services ensures continuity of case workers for program participants. See [Additional Supportive Services policy, procedure, and forms in Appendix A](#) for more details and guidance on how to implement this continuation of services for a young person.

⁶ See CoC Interim Rule 24 CFR § 578.37(a)(1)(ii)(B))

⁷ Find information on all of the local Public Housing Authorities in Alameda County at <https://www.achcd.org/housing-vouchers-and-alameda-county-housing-authorities/>

Support To Transition from the Program

When participants transition from TH to RRH or transition out of the program entirely, the program should use a transition or exit checklist that covers all necessary steps for transitioning to RRH or exiting the program, including administrative tasks, updated resume, community resources/connections, social support, personal growth reflections, and future planning. The transition guide should also include information on who the young person should reach out to if they encounter any challenges or need additional support, resources in their area, and updated plan that the young person can continue working on independently after program exit. Warm handoffs should be made to any ongoing supportive services prior to the young person's exit from the program.

Following these steps will ensure that participants successfully progress through and ultimately leave the program with a sense of accomplishment, confidence, and readiness for independent housing and personal growth.

Early Exit – Graduation

Program participation should be evaluated on an ongoing basis, and young people should graduate when they are able to maintain housing without financial assistance and supportive services from the program. A young person is considered able to maintain housing without financial assistance when no more than 40% of their income is dedicated to rent, they have successfully paid their rent on time for at least 5 of the last 6 months, and they have an amount saved that is greater than or equal to half of their monthly rent payment. Young people who exit early may still re-enter if they did not receive rental assistance for the maximum number of months available in the program. Any youth who exits early should also be given a transition guide as discussed above in conjunction with warm hand-offs to ongoing supports.

If a young person enrolled in the program obtains another source of rental assistance, such as by receiving a Section 8 housing voucher, it is the young person's choice whether to remain in the program or use the alternate rental assistance and graduate from the program.

Early Exit – Termination

As stated in the federal Continuum of Care Interim Rule⁸, program assistance may be terminated to a program participant who violates program requirements or conditions of occupancy; however, doing should be a last resort after exhausting all other solutions and carefully considering a young person's obstacles to stability. The termination process must be a formalized process that, at minimum, includes the following:

- Provision of a written copy of the program rules and the termination process before the young person begins to receive assistance.
- Written notice to the young person containing a clear statement of the reasons for termination.
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person or a subordinate of that person who made or approved the termination decision.
- Prompt written notice of the final decision to the program participant.

⁸ See 24 CFR § 578.91

The program is expected to exercise reasonable judgement throughout the termination process and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a young person's assistance is terminated only in the most severe cases. See the [Program Termination](#) policy in Appendix A for more details on the process for mediation/termination and possible causes for doing so.

If a young person becomes unreachable, the case manager should make concerted efforts to contact the young person using all available contact information for the young person, their household members, and their care team. At minimum 6 unique outreach attempts must be made, including at least one attempted wellness check/home visit, prior to exiting the young person from the program. In addition, the case manager should do an incarceration search and search all other public systems in an attempt to locate the young person. If all contact means have been exhausted and the young person remains unreachable for 90 days, then the case manager should send a notice of disenrollment to the young person and then disenroll the participant in HMIS if there is no response within the time period identified in the letter.

All steps taken in the mediation/termination process and their results should be provided to the young person and documented in the participant's file. This should include all attempts to contact the young person, as well as documentation that all applicable federal requirements specified above were followed.

Termination does not bar the young person from providing further assistance at a later date to the young person.

[Evictions](#)

The young person is responsible for following all requirements of their lease, and their case manager should support them in doing so. If a participant is evicted from a unit while enrolled in RRH, they should not be terminated from the program. The program should assist them in finding a new housing location, moving them into it, and processing the events leading up to the eviction to identify any changes necessary to ensure they will not be evicted again.

In extreme circumstances, California's Transitional Housing Misconduct Law⁹ authorizes operators of transitional housing programs to remove program participants from housing by applying to a court for a temporary restraining order and injunction where certain types of misconduct have occurred and the participant has not resided on the premises for more than six months. "Misconduct" in this context describes acts that substantially interfere with the orderly operation of the program and involve abuse or illegal behavior as defined in the statute. If the participant has been in transitional housing for more than six months and/or the termination of services is for causes other than those covered in the statute, the situation may require formal eviction proceedings.

Grievance Policy

If a young person wishes to report a grievance, the young person and relevant provider should follow provider-level grievance policies to resolve the issue. Any participant who is dissatisfied with the handling or response to their grievance may appeal to Alameda County Health's Housing and Homelessness Services by contacting the Youth Program Services Coordinator.

⁹ California Civil Code 1954.11-18

Updating the Program Manual

These standards were developed by the YHDP core team, part of the Alameda County Health, Housing and Homelessness Services (H&H) office. H&H may make amendments as required by YHDP or another funding source used in the project to ensure timely compliance with regulations without a formal review process and will provide notice to all program providers and the Youth Advisory Board (YAB) of any such changes. All other changes must be reviewed and approved by providers of the program and by the Youth Advisory Board (YAB). H&H will review the entire policy document and propose any updates or changes on an annual basis.

Appendix A: Alameda County YHDP Joint-Component TH-RRH Project: YHDP Flexibilities Policies, Procedures, and Forms

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The policies, procedures, and forms in this manual serve as documentation of compliance with HUD's requirements, as set forth in the CoC Interim Rule and in HUD's Fiscal Year 2019/2020 YHDP Notice of Funding Opportunity (YHDP NOFO), Appendix A.

This manual uses the terms "flexibilities" and "special activities" interchangeably to refer to the list of activities HUD approved for use under this grant agreement, as allowed in the YHDP NOFO, Appendix A, Part I.C.1.

Policies to Support YHDP Flexibilities

(1) Minimum Lease Term Policy & Procedure

Purpose

The policy provides flexibility to youth and young Adults (YYA) seeking housing through the Joint-Component TH-RRH project by allowing minimum lease terms of one month under the rental assistance budget line items.

Under this HUD grant agreement, this Joint Component TH-RRH project is allowed to "have leases for a minimum term of one month under rental assistance budget line items" (per YHDP NOFO Appendix A, Part I.C.1.a.(1)). The NOFO does not require this project to have any specific policies around when and how this flexibility is used, but this project wishes to institute one to ensure decisions to allow lease terms of under 12 months are in the participant's best interest and are low-risk in their potential to exploit the participant.

Policy

This Joint-Component TH-RRH project may provide rental assistance under RRH for participants with leases with a minimum term of one month (usually, the CoC Program requires a minimum lease term of 12 months). The minimum term of one month aims to provide flexibility and accessibility for YYA who have experienced homelessness, allowing them to secure stable housing without being constrained by longer-term lease obligations.

Case managers must work with youth participants to identify whether a lease term of under 12 months (a) is what they want and (b) seems like a strength and seems unlikely to be exploitative to the participant longer term. Case managers must document their justification for using this flexibility.

Eligible justification:

- **Credit or Rental History:** For example, YYA has experienced rental evictions or rental debt, making it challenging to secure a landlord willing to commit to a year-long lease. A flexible leasing option would help them to demonstrate a commitment to timely payments while building trust with the landlord.

- **Housing Uncertainty:** For example, YYA's housing plan is currently not aligned with Fair Market Rent and is on various housing waitlists for affordable housing or other supports outside of this program. This means they are uncertain about the duration of their waitlisted status and require a shorter-term lease to avoid being bound by longer-term obligations, ensuring flexibility as their housing situation evolves.
- **Upcoming Life Changes:** For example, YYA is planning to enter college and live on campus, enter into the military, move elsewhere, or move in with a partner in less than 12 months. These life events introduce a level of uncertainty regarding housing needs, making a shorter-term or month-to-month lease the most suitable option to support the young person's choice and goals.
- **Fulfilled year-long lease and it's now changing terms:** For example, a YYA had a year-long lease that they fulfilled and it transitions to month-to-month after the first year.
- **Other:** This flexibility can be utilized for other reasons as determined by the participant, case manager, and program manager.

Process

1. The case manager must fill out the form below, including an attached copy of the proposed lease, whenever a program participant needs or requests a lease term of less than 12 months.
2. Program manager must review within 2 business days. The program manager must document their approval or denial of the proposed lease term and plan and notify the case manager once a decision has been made.
 - a. If denied, and if there is more documentation needed to be able to approve the request, the case manager must follow up and repeat steps 1 and 2 within a week, in consultation with the program participant.
3. The case manager must save a copy of the completed form and documentation alongside the participant's lease in their case file.

Form

The minimum lease term request form is available at

<https://drive.google.com/drive/folders/1bYQuenYT7Sn7TB6L013DGNT3pHUGyEYp>

(2) Habitability Standards Policy & Procedure

Purpose

This policy supports the implementing agency in using habitability standards rather than Housing Quality Standards for this Joint-Component TH-RRH grant.

Under this HUD grant agreement, this Joint Component TH-RRH project is allowed to “use habitability standards in 24 CFR 576.403(c) rather than Housing Quality Standards in 24 CFR 578.75 for short or medium-term (up to 24 months) housing assistance” (per YHDP NOFO Appendix A, Part I.C.1.a(7)). To use this special YHDP activity, the NOFO requires the project to “keep documentation of which standards are applied to the units and proof that the units complied with the standards before assistance is provided for every unit funded by YHDP.”

Additional resources related to habitability standards may be found at these links:

- [ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing](#) (HUD Exchange). Includes:
 - Overview document of HUD’s habitability standards as they apply to emergency shelter and permanent housing settings
 - Sample habitability inspection checklist.
- [Sample Habitability Standards Checklist](#) (hud.gov)

Policy

In the first 30 days, and at least once every 12 months during the period of assistance, case managers are required to conduct a habitability standards inspection using the attached form for any participant housed by this program to ensure that any unit for which this project is paying leasing or rental assistance meets HUD’s habitability standards in 24 CFR 576.403(c).

Program managers are required to review and approve all Habitability Standards Forms before the program pays for any rental assistance or leasing dollars toward a program participant’s housing. Ideally, participants should not sign leases before completing the inspection, as doing so may risk loss of security deposit or other negative impacts on their rental history and credit.

Process

1. Case manager conducts a habitability standards inspection using the Habitability Standards Form that accompanies this policy within 3 business days of the unit being identified as an option for a program participant.
 - a. If the unit does not pass inspection, the case manager provides required updates to the landlord.
 - i. If the landlord makes the requisite fixes, the case manager must re-do step 1 before moving to step 2.

- ii. If the landlord does not comply with the request, then the participant / case manager must find another unit for the participant to move into that does pass inspection.
- 2. If the unit passes the inspection, the case manager submits the form to the program manager.
- 3. Program manager reviews the Habitability Standards Form within 1 business day.
 - a. If the program manager has questions or concerns with the form's completion or the state of the unit, they must discuss with the case manager within 2 business days to determine next steps.
- 4. If the program manager approves the Habitability Standards Form, they sign off on it and notify the case manager that they can move forward with next steps to support the program participant in signing a lease and moving into the unit.
- 5. Case manager must save a copy of the completed and signed Habitability Standards Form in each program participant's file and upload in HMIS.

Form

The habitability standards form is available at

<https://drive.google.com/drive/folders/1bYOuenYT7Sn7TB6L013DGNT3pHUGyEYp>

(3) Flexible Costs Policy & Procedure

Purpose

This policy enables the agencies implementing this Joint-Component TH-RRH project to spend supportive service dollars on specific costs and activities beyond those normally allowed under the CoC Interim Rule. For more information on allowable costs, see [Appendix B](#).

Under this HUD grant agreement, this Joint Component TH-RRH project is allowed to pay for or directly provide the specific costs/activities detailed in the policy section below (per YHDP NOFO Appendix A, Part I.C.1.a.(10), subparts (a), (b), (c), (d), (e), (f), (g), (h), (i), (j), and (k)). In alignment with HUD's requirements as stated in the YHDP NOFO Appendix A, Alameda County Housing & Homelessness Services staff notified HUD's Deputy Assistant Secretary of Special Needs via email (to Micah Sneed and youthdemo@hud.gov) that this project also intended to use special activity I.C.1.a(10)(l), which was not originally included in the HUD grant agreement.

To use this special YHDP activity, the NOFO requires the project to "maintain records establishing how it was determined paying the costs was necessary for the program participant to obtain and retain housing and must also conduct an annual assessment of the needs of the program participants and adjust costs accordingly."

Policy

This project may pay for or directly provide the following "flexibilities," if they are necessary to assist program participants to obtain and maintain housing. **In addition to the required documentation and payment guidelines listed for each item, the program must (1) maintain documentation justifying why paying the costs was necessary for the program participant to obtain and retain housing and (2) conduct annual assessment of program participant needs and adjust costs accordingly.** The form that accompanies this policy embeds prompts to maintain this documentation alongside other required documentation.

Flexibility	Required Documentation	Payment Guidelines
a. Security deposits for units in an amount not to exceed 2 months of rent	<ul style="list-style-type: none"> Lease in participant's name, documenting security deposit and rent amounts W-9 form for landlord 	<ul style="list-style-type: none"> Payment must be made directly to the landlord

Flexibility	Required Documentation	Payment Guidelines
b. The costs to pay for any damage to housing due to the action of a program participant, which may be paid while the youth continues to reside in the unit. The total costs paid for damage per program participant may not exceed the cost of two months' rent.	<ul style="list-style-type: none"> Lease in participant's name, documenting monthly rent amount Photos of the damage to be repaired If contracting with a person or company to do the repairs: At least 2 estimates for the cost to repair damage to justify cost reasonableness If building / landlord is managing the repairs: invoice from them for costs to be incurred. Receipts from contractors paid or materials purchased to repair damage 	<ul style="list-style-type: none"> All payments must be made directly to a third party. This could be the person or company that repairs the damage (if contracting) or the store from which materials used to repair damage were purchased.
c. The costs of providing household cleaning supplies to clients.	<ul style="list-style-type: none"> Itemized receipt of household cleaning supplies purchased. 	<ul style="list-style-type: none"> Can be paid directly to store or company from which supplies are purchased If paying with a gift card: this amount is not reimbursable unless you have a receipt for the total amount of the gift card that details that all funding went toward cleaning supplies.
d. Housing start-up expenses for program participants, including furniture, pots and pans, linens, toiletries, and other household goods, not to exceed \$300 in value per program participant.	<ul style="list-style-type: none"> Itemized receipt of items purchased. Verify that it costs \$300 or less per participant. 	<ul style="list-style-type: none"> Can be paid directly to store or company from which items are purchased If paying with a gift card: this amount is not reimbursable unless you have a receipt for the total amount of the gift card that details that all funding went toward eligible items.

Flexibility	Required Documentation	Payment Guidelines
		<ul style="list-style-type: none"> Cannot exceed \$300.
e. The one-time cost of purchasing a cellular phone and service for program participant use, provided that access to a cellular phone is necessary to obtain or maintain housing and the costs of the phone and services are reasonable per 2 CFR 200.404 .	<ul style="list-style-type: none"> Itemized receipt for the cell phone purchased Itemized receipt for the service deposit paid (if applicable) Justification for reasonable cost 	<ul style="list-style-type: none"> Must pay vendor of cell phone or service deposit directly This cost can only be incurred one time per participant. This means that you cannot pay for cell phone service ongoing. This can only cover the service deposit cost, if applicable.
f. The cost of internet in a program participant's unit and the costs of the service is reasonable per 2 CFR 200.404 .	<ul style="list-style-type: none"> Invoice for the cost of internet services with the participant's name and unit address (which must match the address on their lease or the unit in which the program holds a lease for them to reside) on the invoice Justification for reasonable cost 	<ul style="list-style-type: none"> Must pay internet service provider directly
g. Payment of rental arrears consisting of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.	<ul style="list-style-type: none"> Copy of the lease under which the participant accrued arrears. Their name must be on the lease. Invoice for rental arrears accrued Documentation of the number of months of rental arrears paid (can include late fees) Documentation that rental arrears were paid to the landlord in accordance with the lease (recommend getting landlord's W9, too) 	<ul style="list-style-type: none"> Must pay the landlord directly. Program can only make this payment one time.
h. Payment of utility arrears of up to 6 months per service .	<ul style="list-style-type: none"> Invoice for utility arrears accrued, for each utility service to which arrears have been applied. The participant's name must be on the account. Documentation of the number of months of utility arrears paid. If the utility company cannot 	<ul style="list-style-type: none"> Must pay the utility company(ies) directly.

Flexibility	Required Documentation	Payment Guidelines
	provide a month by month breakdown, document assumptions and justification for how many estimated months this payment includes.	
i. (i) Up to three months of utilities for a program participant, based on the utility costs schedule for the unit size and location.	<ul style="list-style-type: none"> • Invoice for the cost of utilities with the participant's name and unit address (which must match the address on their lease or the unit in which the program holds a lease for them to reside) on the invoice. Dates of service must occur during participant's enrollment in the project; if they were from before, please refer to the utility arrears section above. • Must use current utility costs schedule for the unit size and location. These are set by the local Housing Authority. The current (June 2024) version is available here: Utility Allowance Housing Authority Of County Of Alameda HACA • Itemized receipt for payment made directly to the utility service that aligns with utility allowance and utility bill. 	<ul style="list-style-type: none"> • Must pay directly to the utility service.
j. In addition to transportation costs eligible in 24 CFR 578.53(e)(15), a recipient may pay gas and mileage costs for a program participant's personal vehicle for trips to and from medical care, employment, childcare, or	<ul style="list-style-type: none"> • If paying for gas: Documentation of the # of miles the participant is driving to eligible locations (work, school, child care, medical appointments, or other services eligible under this grant), an estimated number of miles per gallon needed to drive that amount, and an itemized gas receipt showing that the program 	<ul style="list-style-type: none"> • If paying for gas: Must pay for gas directly to align # gallons purchased with miles driven, as noted to the left. • If paying for mileage: Can pay the program participant directly.

Flexibility	Required Documentation	Payment Guidelines
other services eligible under this section.	<p>only paid for gas for the participant to get to eligible locations.</p> <ul style="list-style-type: none"> • If paying for mileage: A mileage log with each date mileage is provided, # miles driven, and the origin and destination (which can only be to the same eligible services/ activities as noted above). Use the relevant federal mileage rate, available here: Privately owned vehicle (POV) mileage reimbursement rates GSA. (For 2024, the rate is \$0.67/mile) 	
k. Legal fees , including court fees, bail bonds, and required courses and equipment.	<ul style="list-style-type: none"> • Official documentation of the amount owed and for what, including the participant's name 	<ul style="list-style-type: none"> • Payment must be made directly to the third party charging the fees or providing the courses or equipment.

Before paying for any of the costs detailed above, the case manager must complete the form below, and the program manager must sign off.

Program managers should regularly (at least quarterly) review total spending per participant to monitor that program participants have equitable access to these (and other) service costs, depending on their circumstance and need. That is, participants should have equal access to these resources, regardless of who their case manager is and regardless of how much funding they need to obtain and maintain housing.

Process

1. Case manager works with program participant to identify when these eligible costs would support the young person in obtaining or maintaining their housing.
2. Case manager fills out the Flexible Costs Form below, attaches any required documentation, and submits it to the program manager for review.
3. Program manager reviews within 2 business days.

- a. If they have further questions or deny the request, they must communicate that and any needed next steps or additional documentation to the case manager. The case manager must repeat step 2 if applicable.
4. If the program manager approves the request, the case manager must file this form and the accompanying documentation in the participant's file. The agency should follow their internal processes for getting direct costs paid.

Forms

All required forms for utilizing the YHDP flexible costs are available at

<https://drive.google.com/drive/folders/1Yc887-d7pSPRNvsLhZ4s14tJHYYdjGPi?usp=sharing>

(4) Additional Rental Assistance (24 to 36 Total Months) Policy & Procedure

Purpose

This policy documents what agencies must do to provide more than 24 months of RRH rental assistance and up to a maximum of 36 months of rental assistance to project participants.

Under this HUD grant agreement, this Joint Component TH-RRH project is allowed to provide project participants with up to 36 months of rental assistance in RRH (per YHDP NOFO Appendix A, Part I.C.1.b(1)). To use this flexibility, the NOFO requires the project to demonstrate: “(1) the method it will use to determine which youth need rental assistance beyond 24 months and (2) the services and resources that will be offered to ensure youth are able to sustain their housing at the end of the 36 months of assistance.”

Policy

This Joint-Component TH-RRH project may provide rental assistance under RRH for participants for up to 24 total months without special permission, and up to 36 total months if approved under this policy.

RRH rental assistance extensions may be requested in 3- or 6-month increments, up to a maximum of 36 total months of rental assistance, to address specific barriers impacting the participant’s housing stability.

Case managers must work with participants to identify (1) why they have a need for more than 24 months of rental assistance, and (2) how the participant and case manager will support the participant in being able to sustain housing long-term at the end of their housing assistance.

Eligible justification for extended rental assistance:

- **Health/Medical Issues** that impact participant’s housing and self-sufficiency. This may include changes in medical/health status over the course of program enrollment (e.g., new diagnoses) or ongoing chronic health/medical issues that the participant needs additional time to stabilize.
- **Mental health, addiction, or developmental issues**, either new or ongoing, that interfere with the participant’s progress in achieving self-sufficiency.
- **Job loss or other reduction in income** that renders the participant unable to afford the full cost of housing/utilities.
- **Social factors or experiences** that have impacted the participant’s progress in achieving self-sufficiency. This could include changes in circumstances related to the participant’s pregnancy/parenting status, domestic violence, bereavement, victimization, legal issues, or human trafficking.
- **Student status or enrollment in a training program** that impacts the participant’s ability to maintain a full-time income for a set period of time.
- **Other** (must specify and provide supporting documentation).

Process

1. At least one month before the program participant's rental assistance is set to expire (i.e., by the 23rd month of rental assistance and at least a month before any previously approved extensions expire), the case manager works with program participant to identify whether they may need ongoing housing assistance.
2. Case manager fills out the Additional Rental Assistance Request Form below and submits it to the program manager for review.
3. The program manager reviews within 5 business days.
 - a. If they have further questions or deny the request, they must communicate that and any needed next steps or additional documentation to the case manager. The case manager must repeat step 2 if applicable.
4. If the program manager approves the request, the case manager must file this form in the participant's file.

Form

The Additional Rental Assistance Request form is available at

<https://drive.google.com/drive/folders/1bYOuenYT7Sn7TB6L013DGNT3pHUGyEYp>

(5) Additional Supportive Services Assistance (6 to 36 Total Months after End of Rental Assistance) Policy & Procedure

Purpose

This policy documents what agencies must do to provide more than 6 months and up to 24 total months of supportive services to project participants after their last housing assistance payment (i.e., after the last RRH rental assistance payment).

Under this HUD grant agreement, this Joint Component TH-RRH project is allowed to provide project participants with up to 24 months of services after their last RRH rental assistance payment or up to 36 months if the services are in connection with housing assistance, such as the Foster Youth to Independence initiative, or if the recipient can demonstrate that extended supportive services ensures continuity of case workers for program participants (per YHDP NOFO Appendix A, Part I.C.1.b(2)). To use this flexibility, the NOFO requires the project to demonstrate: “(1) the proposed length of extended services to be provided; (2) the method it will use to determine whether services are still necessary; and (3) how those services will result in self-sufficiency and ensure stable housing for the YHDP program participant.”

Policy

This Joint-Component TH-RRH project may provide supportive services (including paying direct costs covered under those eligible for this grant’s supportive services) to participants for up to 6 months after their last rental assistance payment without special permission, and up to 24 total months after their last rental assistance payment if approved under this policy.

Supportive services extensions may be requested in 3- or 6-month increments, up to a maximum of 24 total months of post-housing-assistance services, to address specific barriers impacting the participant’s housing stability.

Case managers must work with participants to identify (1) why they have a need for more than 6 months of services after their housing assistance ends, (2) the services to be provided, and (3) how the participant and case manager will support the participant in being able to sustain housing long-term once their access to these services ends.

Eligible justification for extended supportive services:

- **Health/Medical Issues** that impact participant’s housing and self-sufficiency. This may include changes in medical/health status over the course of program enrollment (e.g., new diagnoses) or ongoing chronic health/medical issues that the participant needs additional time to stabilize.
- **Mental health, addiction, or developmental issues**, either new or ongoing, that interfere with the participant’s progress in achieving self-sufficiency.
- **Job loss or other reduction in income** that renders the participant unable to afford the full cost of housing/utilities.

- **Social factors or experiences** that have impacted the participant's progress in achieving self-sufficiency. This could include changes in circumstances related to the participant's pregnancy/parenting status, domestic violence, bereavement, victimization, legal issues, or human trafficking.
- **Student status or enrollment in a training program** that impacts the participant's ability to maintain a full-time income for a set period of time.
- **Other** (must specify and provide supporting documentation).

Process

1. At least one month before the program participant's supportive services timeframe is set to expire (i.e., by the 5th month after their last rental assistance payment and at least a month before any previously approved extensions expire), the case manager works with program participant to identify whether they may need ongoing supportive services.
2. Case manager fills out the Additional Supportive Services Assistance Form below and submits it to the program manager for review.
3. The program manager reviews within 5 business days.
 - a. If they have further questions or deny the request, they must communicate that and any needed next steps or additional documentation to the case manager. The case manager must repeat step 2 if applicable.
4. If the program manager approves the request, the case manager must file this form in the participant's file.

Form

The Additional Supportive Services Assistance Request form is available at

<https://drive.google.com/drive/folders/1bYQuenYT7Sn7TB6L013DGNT3pHUGyEYp>

(6) Employing People Enrolled in Services Policy & Procedure

Purpose

This policy documents what agencies must do when employing current or former participants to avoid conflicts of interest and inappropriate power dynamics.

Under this HUD grant agreement, this Joint Component TH-RRH project is allowed to employ youth who are receiving services from this project or agency (per YHDP NOFO Appendix A, Part I.C.1.a(6)). To employ youth who meet this definition, the NOFO requires the project to “maintain documentation that discloses the nature of work that the youth does, and that the youth is not in a position that creates a conflict of interest.”

Policy

Agencies implementing this project are committed to hiring young people whose lived experience and other skills equip them to be excellent staff supporting people experiencing or at risk of homelessness. This agency is committed to ensuring that, upon hiring people with past, current, or future engagement as service participants in this or other programs operated by the employing agency, this will not present a conflict of interest for the person hired or anyone else on staff.

Supervisors who supervise any employee who is also enrolled in services as a participant must include in regular check-ins questions about any conflicts of interest that are coming up, including any potentially uncomfortable or coercive power dynamics arising from the person’s role as both employee and service participant.

Process

When hiring a young person enrolled in the Joint Component TH-RRH project or other services offered by the agency implementing this project, the Joint Component TH-RRH project’s program manager must complete the relevant form(s) below and keep this documentation on file in both the employee’s records and in their participant records/case file.

Form

Forms for employing current or former participants and for enrolling current employees available at <https://drive.google.com/drive/folders/1bYQuenYT7Sn7TB6L013DGNT3pHUGyEYp>

General Policies

(7) Food Provision Policy

Each program is expected to provide a monthly allocation of groceries to each participant in the project. This support should be provided regardless of any other food assistance the participant is receiving. Each program should provide \$200/month of grocery assistance to each household, regardless of the number of household members. The amount of assistance is set at the project level and cannot be adjusted without notifying the CoC or collaborative applicant and getting approval from the Youth Action Board.

Please note that you must be able to document that funds were spent on food items only for participants that are enrolled in the YHDP- funded program.

(8) Income Verification Policy

YHDP RRH programs are governed by section 578.37(a)(1)(ii) of the CoC Program interim rule, the CoC's written standards, and these policies.

The CoC Program interim rule does not identify any required documentation for determining income when calculating a participant's rent contribution. Additionally, the interim rule does not address the timeframe for income verification documentation. Therefore, the timeframe and documentation standards for YHDP-RRH projects have been by local policy.

SSI/SSDI and other documentation generally provided on an annual basis	Must be dated within a year
Pay stubs and other documentation generally provided on a monthly or weekly basis	Must be dated within 30 days
Non-traditional work (unverifiable)	Can be self-reported/estimated without documentation

Income should be re-certified every 3-months to determine the amount of contribution toward rent to be paid by the program participant. Adjustments to a program participant's rent contribution must be made as changes in income are identified.

Significant Change in Status

A significant change in status is defined as an unplanned life event that occurs outside of the household's control, that significantly decreases their income and causes significant hardship. Case managers can re calculate the household's rent portion immediately if a significant change of status has occurred. This can include, but is not limited to:

1. Fleeing domestic violence or other threats of violence
2. Unemployment and delay in unemployment benefits

3. Major medical or psychiatric hospitalization of household, or household's immediate family member
4. Death of a child or immediate family member
5. Enrollment in short term vocational or educational program that will lead to increased earning potential at the end of the program (** this may be a planned event at the time of entry into the program*)
6. An unplanned event that the case manager deems significant enough in nature to determine a rent recalculation or payment plan would be appropriate. (*please note that rationale for this must be clearly documented in the case notes.*)

A participant must not be terminated from housing if their income cannot be recertified.

Additional Resources:

- Part 5 (Section 8) Income and Asset Inclusions and Exclusions: <https://www.hudexchange.info/resource/5180/part-5-section-8-income-inclusions-and-exclusions/>
- Part 5: Determining Income and Calculating Rent: [PHOG Income Determination FINAL \(hud.gov\)](#)

(9) Program Termination

Programs are strongly encouraged to proactively outreach and use case management with program participants to help them comply with the terms of their lease and maintain housing stability.

Programs should provide a written termination and grievance procedure, including the process by which participants can provide feedback. Participants should acknowledge they have received a copy of the program's rules and termination and grievance policy prior to receiving assistance. This acknowledgement should be documented in the participant's file. Participants should only be considered for termination for severe and/or repeated offenses.

Causes for Mediation and Possible Termination (including but not limited to:

- Persistently making others feel unsafe with harassment or violence.
- Persistent substance use or substance selling/manufacturing causing an unsafe situation for oneself or others.
- Persistent violation of house/program norms resulting in an unsafe situation for others.
- Persistent violation of lease between participant and landlord and refusal to participate in a corrective action plan / landlord-participant mediation.
- Destruction of property.
- Extended period of no contact with program staff.

Mediation/Termination Procedure:

First Step – Verbal and written warning that the participant will be terminated if they continue to violate program rules and a description of corrective steps to take. Participant and Case Worker will collaborate on a corrective action plan.

Second Step – Mediation meeting with the Case Worker and Supervisor and discussion in case conferencing.

Third Step (if necessary) – Solutions and suggestions will be provided by agency leadership and a final warning given to the participant.

Fourth Step – Termination from the program. Participant receives verbal and written confirmation of their termination. Referred to other support services as eligibility allows.

Appendix B:

Alameda County YHDP Joint Component TH-RRH Spending Guidance

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This guide was developed in collaboration with technical assistance (TA) partners specifically for Alameda County's YHDP Joint-Component Transitional Housing-Rapid Re-Housing (TH-RRH) project. It includes guidance from the [CoC Program Interim Rule](#), HUD's [Ask-A-Question \(AAQ\) desk](#), and the [FY 2019/2020 YHDP Notice of Funding Opportunity \(NOFO\)](#) (specifically [Appendix A](#)) on what this grant can and cannot spend funds on. It is provided specifically to address what HUD's requirements are, though there may be local policies and requirements that impose stricter limits on some activities and items.

Where applicable, this project must use the YHDP flexibilities policies, procedures, and forms provided in [Appendix A](#) to implement these special activities, as many of them require the project staff to document a standard process for determining when special activities should be used.

Supportive Services

Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service.

Supportive services must be necessary to assist program participants obtain and maintain housing.

The program must conduct an annual assessment of the service needs of the program participants and should adjust services accordingly.

For transitional housing, supportive services must be made available to residents throughout the duration of their residence in the project.

Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.

Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month as set forth in [§ 578.37\(a\)\(1\)\(ii\)\(F\)](#), to assist the program participant in maintaining long-term housing stability.

Eligible supportive services are covered in **§ 578.53 Supportive services, subsection (e) Eligible Costs**, of the [CoC Program Interim Rule](#). Each one is listed below, alongside some additional guidance on how it can and can't be used.

Costs in this section are also inclusive of the costs of staff to provide these services.

Annual Assessment of Service Needs

From the CoC Interim Rule: The costs of conducting annual assessment as required by CoC Interim Rule § 578.53(a)(2).

Assistance with Moving Costs

Normally, under the CoC Interim Rule, a project can provide moving expenses one time per participant; however, **this program may provide moving expenses more than one time to a program participant as a special YHDP activity/flexibility.**

Eligible costs under this activity include:

- Hiring a moving company
- Renting a truck/vehicle to move

Note that each “time” you use this activity per client this doesn’t just have to be one single day or trip to move, as long as it’s a single incident of moving into one unit. That is, you could have costs associated with moving someone’s things from a storage unit to new unit, could pick up furniture from a furniture bank on a different day, etc.

Case Management

From the CoC Interim Rule: “The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participants. Activities include:

- Counseling;
- Developing, securing, and coordinating services;
- Using the centralized or coordinated assessment system as required under CoC Interim Rule [§ 578.23\(c\)\(9\)](#).
- Obtaining federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.”

Child Care

From the CoC Interim Rule: “The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.

- The children must be under the age of 13, unless they are disabled children.
- Disabled children must be under the age of 18.
- The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.”

Education Services

The CoC Interim Rule allows for “the costs of improving knowledge and basic educational skills.” These include:

- Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
- Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.”

In general, eligible educational expenses under the CoC Program should be used for classes or training provided by the service provider (i.e., the recipient) (or a subrecipient, contractor, or outside vendor).

When the service provider (i.e., the recipient) (or a subrecipient, contractor, or outside vendor) is providing educational services, some supplies such as a computer may be eligible. *(See the section below on [purchasing technology as an education service](#))*

In some cases, CoC Program funds may be used to pay for a class or a few classes at an institution of learning, such as a community college, to provide program participants with basic skills that are directly necessary for increasing their self-sufficiency, such as ESL classes or basic computer skills. However, in no case can CoC Program funds be used to pay for the full cost of tuition for a degree or vocational accreditation. In some cases, a vocational accreditation may be an eligible expense under section 578.53(e)(6), employment assistance and job training, but in no cases would it be eligible under education services.

However, the cost of obtaining something like a commercial driver’s license (CDL) and/or certificate could be considered an eligible employment assistance cost so long as the cost is reasonable and appropriate.

OMB Circular 2 CFR 200.75 outlines participant support costs such as stipends, which are allowable in connection with training projects. Similarly, the COC Program interim rule at Section 578.53(e)(6) states: "The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost." A recipient may provide a stipend when a participant participates in an employment assistance and job training programs, **even one operated by another organization.**

A "stipend" is fixed sum of money paid periodically to program participants for services or to defray expenses. The stipend must be paid directly to program participants. Once the program participant receives the stipend (s)he may use it to cover his or her expenses.

As it relates to what would be considered a "reasonable" stipend would be, "reasonable" refers to the amount being paid or provided to defray costs as similar when compared to similar tasks or expenses. You should take into consideration the costs of living for your particular region. This means that reasonable will vary from community to community based on the cost of living. For example, if you

are trying to defray the costs of travel, then you should consider the costs of travel in general for your region.

Recipients must document that the stipend covers reasonable costs.

Technology to Support Education Services

The short answer is: no, you can't buy clients technology even if it supports their education or employment. Here's official language from the AAQ:

"For the purpose of this response, consider "computer" to refer to computers, laptops, tablets, mini-pads like the iPad, etc.

Computers/laptops/tablets

No CoC (this includes YHDP) Program grant funds may not be used to purchase computers that **participants consider their own**. If a computer is for the personal use by program participants, it is not an eligible CoC program cost.

There is one exception about computer costs for participants. Section 578.53(e)(5) Educational Services provides that the costs of improving knowledge and basic educational skills are eligible costs under the CoC Program. Eligible component services or activities include supplies and instructional material. The costs of a computer for program participants **to use (but not own)** may be considered an eligible supply so long as it is necessary and directly related to carrying out educational activities and so long as it is necessary for program participants to obtain and maintain housing.

Further, the cost of a computer must comply with the requirements in the Omni Circular (2 CFR 200). The Omni Circular requires that all CoC Program costs must be reasonable and appropriate. In addition, in order for the computer to be considered a supply rather than equipment, the cost must be less than \$5000. Keep in mind, it important that the recipient or subrecipient maintain documentation that all of the requirements above are documented and maintained in the organizations records for the timeframe required by the program regulation (see 24 CFR 578.103 for more information).

CoC Program interim rule: <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

Employment Assistance and Job Training

The CoC Interim Rule states that the following are eligible under this line item: "The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment consist of:

- Employment screening, assessment, or testing;
- Structured job skills and job-seeking skills;
- Special training and tutoring, including literacy training and pre-vocational training;
- Books and instructional material;
- Counseling or job coaching; and
- Referral to community resources.”

If you’re doing employment services, you have flexibility to pay for things like work clothes, expensive certification programs, etc.

Additionally, the CoC Program interim rule does not identify a maximum amount that can be spent on employment assistance and job training. Nevertheless, recipients and subrecipients should consider several factors:

- The OMB Omni-Circular at 24 CFR Part 200 requires that all costs paid for with federal funds must be allowable, reasonable, and allocable. In addition, the recipient or subrecipient must maintain documentation that all of the requirements above are documented and maintained in the organizations records for the timeframe required by the program regulation. (See 24 CFR 578.103 for more information.)
<https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>
- In their policies and procedures, recipients/subrecipients should document their decision-making process and practices for paying for supportive services like employment assistance and job training and educational assistance. Policies and procedures need to be clearly understood by participants and applied consistently.
- Grant funds are limited. Recipients/subrecipients should take budget constraints into consideration when deciding the payment amounts for various programs.

Food

From the CoC Interim Rule: “The cost of providing meals or groceries to program participants is eligible.”

Note that you must have itemized receipts for what was purchased, and you can only seek reimbursement after a purchase has been made.

The cost of gift cards to grocery stores or other places are not eligible costs in and of themselves. They are only eligible costs (and therefore only reimbursable) once they have been used to pay for eligible food purchases, and only in the amount used to purchase eligible items.

Housing Search and Counseling Services

From the CoC Interim Rule: “Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.

- (i) Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.
- (ii) Other eligible costs are:
 - (A) Mediation with property owners and landlords on behalf of eligible program participants;
 - (B) Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and
 - (C) The payment of rental application fees.”
- (iii) Housing counseling, as defined in [§ 5.100](#), that is funded with or provided in connection with grant funds must be carried out in accordance with [§ 5.111](#). When recipients or subrecipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of Housing counseling, as defined in [§ 5.100](#), and therefore are not required to be carried out in accordance with the certification requirements of [§ 5.111](#).

With regard to housing search and counseling services, the [Housing Counseling Final Rule](#) defines housing counseling as: independent, expert advice customized to the need of the consumer to address the consumers’ housing barriers and achieve their housing goals and must include the following process: intake; financial and housing affordability analysis; an action plan, except for reverse mortgage counseling; and a reasonable effort to have follow-up communication with the client when possible.

It is generally understood that the following are eligible activities:

- Tenant counseling
- Assisting individuals and families to understand leases
- Securing utilities
- Making moving arrangements
- Mediation with property owners and landlords on behalf on eligible program participants
- Credit counseling, assessing a free personal credit report, and **resolving personal credit issues**; and
- Payment of rental application fees

Credit Repair

Common question: How is "resolving personal credit issues" defined and what activities are allowed?

"Personal credit issues" typically refer to factors that affect a person's credit report and the evaluation of their applications for credit, insurance, employment, and leases, to include debt and debt collections; late payments on bills, rent, and student loans; and unpaid judgments.

Activities related to resolving those issues could include assisting participants connect with reputable housing counseling agencies or credit counseling organizations, obtain their credit reports, dispute credit reports or billing, or communicate with a debt collector.

CoC Program funds can be used for the staff and overhead costs to engage in these activities with participants. Section 578.59(a) of the [CoC Program interim rule](#) states that staff and overhead costs directly related to carrying out activities that are eligible under §578.43 through § 578.57 are eligible as part of those activities in the grant agreement.

Resolving personal credit issues does not include making payments on a client's behalf. Unfortunately, past bills incurred by clients prior to entry are not an eligible cost under the CoC Program interim rule. HUD recommends using leveraged funds to cover debt, such as a credit report fee. Resolving personal credit issues by paying a fee on a credit report would not qualify as housing counseling because it doesn't meet the definition from the Housing Counseling Final Rule as stated above.

Leverage in the CoC Program is cash and in-kind contributions in excess of the minimum required match contributions for a project. A recipient/subrecipient may use leveraged funds for other aspects of a project even if the costs are not allowable in the CoC Program.

Legal Services

From the CoC Interim Rule: Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.

- (i) Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.
- (ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.
- (iii) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.
- (iv) Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.

Additional YHDP Eligible Cost: Legal Fees

YHDP grant funds may be used for the following if they are necessary to assist program participants to obtain and maintain housing:

- **Legal fees, including court fees, bail bonds, and required courses and equipment.**

You must follow your written policies and procedures and maintain records establishing how it was determined that paying this cost was necessary for the participant to obtain and retain housing.

Assistance with Naturalization Documentation

[The following comes from the AAQ. The requestor asked specifically about being able to file Form N-565, Application for Replacement Naturalization/Citizenship Document, with a \$555 filing fee, to support a young person in a YHDP RRH project in getting access to existing citizenship records.]

As noted above, legal services for immigration and citizenship matters are not eligible costs under the CoC Program. However, under Section 578.53(e)(9)(iii) of the CoC Program interim rule, **filing fees and other necessary court costs are eligible when they help a program participant obtain and maintain housing. Therefore, you could use your supportive service budget line item to pay for the cost of the filing fee.**

Life Skills Training

From the CoC Interim Rule: “The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.”

Mental Health Services

From the CoC Interim Rule: “Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.”

Outpatient Health Services

The CoC Interim Rule names eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

- Providing an analysis or assessment of an individual's health problems and the development of a treatment plan
- Assisting individuals to understand their health needs;
- Providing directly or assisting individuals to obtain and utilize appropriate medical treatment (this includes glasses and other medical equipment needed to treat health conditions);
- Preventive medical care and health maintenance services, including in-home health services and emergency medical services;
- Provision of appropriate medication;
- Providing follow-up services; and
- Preventive and non-cosmetic dental care”

Program funds should not be used to pay the costs of medication, medical equipment, or glasses when a client is eligible to have these costs paid for by Medicare, Medicaid, or another government

program. Please keep in mind the costs must also be reasonable and appropriate (as required by 2 CFR 200). In general, under the CoC Program, all supportive services paid for with grant funds must be necessary to assist program participants with obtaining and maintaining housing.

The purchase of Narcan is also be an allowable cost under “Outpatient Health Services” as long as the Narcan is purchased and made available in accordance with the allowable cost criteria in [2 CFR 200.403](#). It should be prescribed and provided by a licensed medical professional. Please also review [Fact Sheet on Naloxone for CoC, ESG, YHDP and HOPWA Grantees](#).

Outreach Services

It is unlikely that this project will engage in outreach services as defined in the CoC Program Interim Rule, given where it sits within our system. However, for reference, here is what is allowable under this line item:

“The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

- Eligible costs include the outreach worker’s transportation costs and a cell phone to be used by the individual performing the outreach.
- Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.”

Substance Abuse Treatment Services

The CoC Interim Rule allows for: “The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.”

Transportation

Under the CoC Interim Rule, eligible costs are:

- The costs of program participant’s travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.
- Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;
- The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;
- The cost of gas, insurance, taxes, and maintenance for the vehicle;
- The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and

- If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
 - Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);
 - Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and
 - The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

Additional YHDP Eligible Cost: Gas & Mileage for Youth's Vehicle

YHDP grant funds may be used for the following if they are necessary to assist program participants to obtain and maintain housing:

- **Gas and mileage costs for a program participant's personal vehicle** for trips to and from medical care, employment, childcare, or other services eligible under this section.

You must follow your written policies and procedures and maintain records establishing how it was determined that paying this cost was necessary for the participant to obtain and retain housing.

Purchasing a vehicle for the program:

If you're going to purchase a vehicle for YHDP program use that's not 100% dedicated to that program, you need to prorate that purchase in some reasonable way (e.g., by # of participants enrolled in each program). You'll also need to have backup documentation that proves it was used for eligible activities and clients enrolled in the program (e.g., mileage log with a description of the activity, and a link to the client ID or name for whom transportation was provided).

Official guidance from HUD's Ask a Question (AAQ) desk:

"As you know, eligible transportation costs are identified under Section 578.53 of the [CoC program interim rule](#). Eligible transportation costs in this case include the following:

- The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants; and
- The cost of gas, insurance, taxes, and maintenance for the vehicle.

CoC funds must be spent for eligible costs and must be reasonable and appropriate according to the Omni Circular (2 CFR 200). Note that the mileage reimbursement specified in section 578.53(e)(15)(ii) of the CoC Program interim rule is only permissible if staff is **not** using a vehicle owned by a recipient or subrecipient.

The CoC program interim rule does not prohibit a recipient or subrecipient from sharing the costs of the van with a non-CoC funded organization, such as the mental health center, so long as the costs are prorated.

HUD does not prescribe the way in which the costs of the van should be prorated. Prior to purchasing the van, the recipient should work with the mental health agency to determine to what extent each organization anticipates using the van. Since eligible and ineligible activities are carried out using the same equipment (in this case, the van) or supplies, the costs that are actually charged to the CoC Program grant must be prorated to capture costs that were incurred. For example, recipients could prorate costs based on the amount of time that the van will be used by staff for eligible versus ineligible activities or based on a percentage of the mileage incurred conducting eligible and ineligible activities. Good documentation is especially important for activities paid for with different funding sources”

Be sure to follow your agency’s procurement policy for large purchases like vehicles.

Providing participants with ride-shares (Uber, Lyft, etc.) & public transportation

You can pay for ride-shares for clients to get to eligible services (work, school, medical appointments, etc.). You need to have a consistent way to document that public transportation isn’t a good option – e.g., that it would take much longer, that it isn’t reasonably available at the time when it’s needed (e.g., for third-shift workers), that the area the young person would have to walk through or wait in line to catch transport is unsafe, or COVID-19 concerns.

Official guidance from HUD’s AAQ:

- A taxi, Uber, or Lyft would be an eligible cost under transportation in the supportive service section of the CoC Program interim rule, so long as the costs are reasonable and appropriate, and other public transportation options are not available or reasonable for a program participant.
- When public transportation, recipient/subrecipient transport, taxis, Ubers, and Lyfts are used by a program participant for eligible activities under 578.53(e)(15), and the recipient or subrecipient is able to document that it was used to pay for eligible costs, a recipient or subrecipient may draw down funds and be reimbursed for these costs.
- If the recipient or subrecipient is not able to determine and document that the program participant used these modes of transportation for eligible activities, they may not be reimbursed with CoC grant funds for their costs.

Eligible transportation costs include both the costs of a program participant’s travel on public transportation (such as a fare pass) or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under the CoC Program. Therefore, bus tokens or other **single fare passes** on public transportation are eligible to be paid for with CoC Program funds and provided to program participants so long as the recipient or subrecipient is able to document that the program participant is going to a service eligible under section 578.53(e)(15) of the CoC Program interim rule. Generally, a case manager providing case notes and a receipt that the participant used the transportation to access an eligible CoC Program supportive services would be adequate documentation for these costs. Please consult with your local Field Office to determine forms of acceptable documentation.

In general, the **cost of monthly bus passes will not be eligible** since the only time fare passes are eligible transportation costs is when they will be used to transport a program participant to and from services

eligible under the CoC Program. CoC Program funds cannot be used to transport clients to places not eligible under the CoC Program.

Car repairs for clients' personal vehicles

The CoC Interim Rule, Section 578.53 (Supportive Services), subsection (15) (Transportation) names eligible car repair payments for clients:

“(vi) If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

- (A) Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);
- (B) Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and
- (C) The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.”

Utility Deposits

The CoC Interim Rule allows the following under the utility deposits line item: “This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.”

Direct Provision of Services

From the CoC Interim Rule: “If the service described in paragraphs (e)(1) through (e)(16) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:

- The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and
- The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.”

Additional Eligible Costs via YHDP Flexibilities

YHDP grant funds may be used for the following if they are necessary to assist program participants to obtain and maintain housing. Recipients and subrecipients must maintain records establishing how it was determined paying the costs was necessary for the program participant to obtain and retain housing and must also conduct an annual assessment of the needs of the program participants and adjust costs accordingly.

Cleaning Supplies

The program may pay the costs of providing household cleaning supplies to clients.

Housing Start-up Expenses

The program may pay housing start-up expenses for program participants, including furniture, pots and pans, linens, toiletries, and other household goods, not to exceed \$300 in value per program participant.

Cell Phones

The program may pay the one-time cost of purchasing a cellular phone and service for program participant use, provided that access to a cellular phone is necessary to obtain or maintain housing and the costs of the phone and services are reasonable per 2 CFR 200.404.

Internet

The program may pay the cost of internet in a program participant's unit and the costs of the service is reasonable per 2 CFR 200.404.

To utilize these additional YHDP flexibilities, the program must follow the written policies and procedures and maintain records establishing how it was determined that paying this cost was necessary for the participant to obtain and retain housing. See [Appendix A](#) for the policies, procedures, and forms for utilizing these flexibilities.

Ineligible Supportive Services Costs

Any cost that is not described as an eligible cost under this section is not an eligible cost of providing supportive services using Continuum of Care program funds. If you are unsure whether a cost would be eligible, reach out to the Alameda County Youth Program Services Coordinator.

Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible costs.

Rental Assistance

Grant funds may be used for rental assistance for participants. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, state, or local sources.

Monthly Rent

The program may pay monthly rental payments in accordance with the program design of youth rental contributions as specified in the program manual. Rented units must also have a lease in the participant's name and comply with all HUD requirements (rent reasonableness, habitability, etc.) as specified in the program manual. Rent paid may be above Fair Market Rent (FMR) as long as the unit is still found to be Rent Reasonable. For more information see the [Rental Assistance](#) section of the program manual.

Vacancies. If a unit assisted under this section is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. No additional assistance will be paid until the unit is occupied by another eligible person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.

Personnel

The costs of administering rental assistance are considered service delivery costs and are therefore eligible under rental assistance. Costs can include:

- Processing rental payments to landlords
- Verifying participant income and family composition
- Providing housing information and navigation
- Performing rent reasonableness determinations and housing search
- Inspecting units for compliance with habitability or housing quality standards
- Receiving new participants into the program

Security deposits

Under the CoC Interim Rule, rental assistance grant funds may be used for security deposits in an amount not to exceed two months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent.

If anyone under 25 is moving into a housing authority-funded voucher, note that public housing authorities (PHAs) do not have the money to pay for security deposits. YHDP-funded rental assistance under RRH can pay for those security deposits.

Utility Allowances

Utilities that are not included in the program participant's rent may be paid using rental assistance funds, based on the Public Housing Authority's utility costs schedule for the unit size and location.

Additional YHDP Eligible Cost: Property Damages

The program may pay the costs to pay for any damage to housing due to the action of a program participant, which may be paid while the youth continues to reside in the unit. The total costs paid for damage per program participant may not exceed the cost of two months' rent.

Additional YHDP Eligible Cost: Rental Arrears

The program may pay rental arrears consisting of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

Additional YHDP Eligible Cost: Utility Arrears

The program may pay utility arrears of up to 6 months per service.

To utilize these additional YHDP flexibilities, the program must follow the written policies and procedures and maintain records establishing how it was determined that paying this cost was necessary for the participant to obtain and retain housing. See [Appendix A](#) for the policies, procedures, and forms for utilizing these flexibilities.

Administrative Costs

The program may use up to 10% of the grant award for the payment of project administrative costs related to the planning and execution of supportive services provided by the project. Eligible administrative costs include:

- **General management, oversight, and coordination.** Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:
 - Salaries, wages, and related costs of staff engaged in program administration. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:
 - Preparing program budgets and schedules, and amendments to those budgets and schedules;
 - Developing systems for assuring compliance with program requirements;
 - Developing agreements with subrecipients and contractors to carry out program activities;
 - Monitoring program activities for progress and compliance with program requirements;
 - Preparing reports and other documents directly related to the program for submission to HUD;
 - Coordinating the resolution of audit and monitoring findings;
 - Evaluating program results against stated objectives; and
 - Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in this section.
 - Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and
 - Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
- **Training on Continuum of Care requirements.** Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings.

Additional YHDP Eligible Administrative Costs

Allowable YHDP flexibilities in the project administrative costs that do not require special documentation to use them:

- Costs associated with **involving youth with lived experience** in project implementation, execution, and improvement.
- Attending **conferences and trainings** that are not HUD-sponsored or HUD-approved, provided that the subject matter is relevant to youth homelessness.

Operating Costs (TH Only)

Grant funds may be used to pay the costs of the day-to-day operation of transitional housing in a single structure or individual housing units. Eligible costs include:

- The maintenance and repair of housing;
- Property taxes and insurance;
- Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost);
- Building security for a structure where more than 50 percent of the units or area is paid for with grant funds;
- Electricity, gas, and water;
- Furniture; and
- Equipment.

Leasing Costs (TH Only)

Grant funds may be used to lease a structure or a portion of a structure that will be used for Transitional Housing or to lease individual housing units for Transitional Housing. Leasing funds may not be used to lease units or structures owned by the organization.

Rent paid must be reasonable in relation to rents being charged in the area for comparable space or units. If electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds otherwise, these utility costs are an operating cost. Grants funds may also be used to pay security deposits, in an amount not to exceed two months of rent, and first and last month's rent (up to one month each, allowed as an advanced payment), as well as related costs to carrying out leasing activities, such as conducting Housing Quality Standards inspections, paying landlords, etc.