



# Recovery Guide:

## MEETING THE NEEDS OF PEOPLE EXPERIENCING HOMELESSNESS DURING DISASTER RECOVERY

Strategies for Immediate Action

Funding Guide: Recovery Resources to Provide Housing and Services to People Experiencing Homelessness

Overview: Approaches to an Inclusive Recovery

Strategy: Housing First

Strategy: Address Homelessness in your CDBG-DR Action Plan

- Checklist: Ensure the Inclusion of Homelessness in the CDBG-DR Action Plan
- Overview of CDBG-DR Programs for Homelessness

Homeless Preference in Multifamily Housing

- Sample Tenant Selection Plan
- Sample Landlord Outreach Email

Strategy: Tenant Rental Assistance

- Step-by-Step Guide for TBRA Program Post Disaster
- Sample Landlord Outreach Letter
- Sample CDBG-DR TBRA Program Guidelines
- Sample Homelessness Self-Certification
- Funding Summary



# Strategies for Immediate Action

Your jurisdiction can leverage response and recovery resources to support people who are experiencing or are at risk of homelessness in their post-disaster transitions. Early intervention can prevent disruptions that lead to bigger problems.

**Limit the displacement as response winds down.** As disaster shelters close, make sure that every single occupant has appropriate housing. Ideally, housing is within the community, or as close as possible, so that people can reengage with their communities and get back to work, school, doctor appointments, and other critical life activities.

- **Enforce disaster shelter exit standards.** Disaster shelters should stay open until all occupants have a safe place to go. Ideally, your community developed shelter exit standards in advance of the disaster (See [Response Guide](#) and [Preparedness Checklist for Shelter and Services](#)). If not, work with the State, FEMA and Red Cross to keep disaster shelters open as long as possible and develop viable alternatives.
- **Identify local and federal housing resources to fill gaps until permanent options are developed.** Use your HOME, CDBG, CoC, ESG, and other HUD funding to create pathways to housing for those leaving shelters. This may mean repurposing existing funds for housing vouchers while additional affordable housing is developed with recovery funds. It may also mean active outreach to public housing and subsidized multifamily properties to identify newly vacant units. Request extensions for FEMA Individual Assistance, where possible, to help pay for interim housing. (See the list of [resources that support housing and services post disaster](#).)

**Partner with the CoC.** Reestablish connections with [your CoC](#) that may have been lost over time and renew dialogue. Ask how you can support each other. See the [list of potential partners](#) in the [Planning Guide](#).

- **Ensure services.** Work with the CoC to identify the need and understand roles to ensure that all persons experiencing or at risk of homelessness receive case management services. It will also be necessary to determine how the coordinated entry process will work in post-disaster efforts to ensure that persons experiencing homelessness are assessed and prioritized for resources appropriately.
- **Maximize shelter options.** Work with emergency shelters to maximize space available for people who have nowhere else to go. This may mean opening winter shelters early, expanding existing emergency shelters, identifying suitable vacant housing units and providing housing and hotel vouchers.
- **Provide funds.** A relatively small infusion of funds (compared to the funds needed to develop housing) can make a significant difference in service providers' ability to scale up their operations to meet recovery needs



**NOTE:** If your community receives CDBG-DR funds, these funds may be used to support eligible activities beginning on the date of the declared disaster. It may take time for these funds to reach your community, but activities conducted during this time may be eligible for reimbursement consistent with CDBG-DR regulations. Don't wait for funds to start your activities, but track your costs so you can be reimbursed.

**Make aid accessible to everyone.** Remember that without intentional effort, recovery resources are unlikely to reach people who lack the skills to navigate the system.

- **Provide disaster case management services for people experiencing homelessness** to help them navigate the disaster recovery programs and access the resources to which they are entitled. Work with your service provider network to identify professional staff and resources for disaster case management services.
- To prevent further homelessness, **engage case managers in the disaster shelters.** Once individuals leave the shelter, it is significantly harder to establish relationships, maintain contact, and provide sufficient support. Early investments of resources in the shelter can contribute to stability and avoid problems later on.
- **Write program policies that affirm that people experiencing homelessness are eligible for assistance.** The local disaster recovery system must work closely with the CoC to identify people experiencing homelessness, both prior to or as a result of the disaster, as eligible for shelter and services. Confirm that program procedures account for the fact that people experiencing homelessness may not have formal addresses. Compensation requirements should recognize that people experiencing homelessness may have lost belongings including tents, sleeping bags, equipment, and clothing.
- **Connect disaster recovery job opportunities with people experiencing homelessness.** Leverage recovery activities and [Section 3 requirements](#) to provide jobs for very low-income people, including those experiencing homelessness. Opportunities may include low-skilled, temporary jobs to support clean up and debris removal, distribution of emergency items, as well as training for new jobs connected to disaster recovery construction and other activities.



# Funding Guide: Recovery Resources to Provide Housing and Services to Persons Experiencing Homelessness

This table summarizes the largest sources of funds that can be used after the disaster to support recovery activities related to preventing and ending homelessness. It does not list all eligible activities for each funding source, but rather focuses on specific activities that can benefit people experiencing homelessness or who are at risk of homelessness. Note that other sources of funds may be available for some activities.

How to Access	Eligible Activities	Notes
<b>Community Development Block Grant – Disaster Recovery (CDBG-DR)</b>		
<p>CDBG-DR is provided through supplemental federal appropriations to the U.S. Department of Housing and Urban Development (HUD) and are allocated to states or entitlement communities based on damage estimates and needs assessments.</p> <p>To access CDBG-DR funds, communities and advocates should contact their <a href="#">state or entitlement community grantees</a> to get involved in any CDBG-DR Action Plan development and support programs and projects that include those who were experiencing homelessness prior to the event.</p> <p>Additional information on CDBG-DR is available on the CDBG-DR page on the HUD Exchange.</p>	<ul style="list-style-type: none"> <li>• <b>Tenant Based Rental Assistance (TBRA).</b> TBRA can be used to subsidize rent and help get people into existing units. Funds are available for up to three months. After three months, it requires a waiver.</li> <li>• <b>Public Services.</b> These include housing services such as housing search, case management, and housing counseling to support people as they find and transition to temporary or permanent housing. They also include services to address health and welfare including but not limited to child care, substance abuse treatment, and job training.</li> <li>• <b>Public Facilities.</b> These can include the purchase and/or rehabilitation of a facility to be used as a shelter to house individuals and/or families experiencing homelessness.</li> <li>• <b>Permanent Supportive Housing.</b> CDBG-DR funds can be used for the construction and/or rehabilitation of a facility to serve as permanent supportive housing.</li> <li>• <b>Match.</b> CDBG-DR funds can be used as match for other federal programs to provide supplemental funds for any otherwise CDBG-eligible activity. For example CDBG-DR can match FEMA Public Assistance for public facilities.</li> </ul>	<ul style="list-style-type: none"> <li>• TBRA can be funded by CDBG-DR for a period of three months. Communities must make a waiver request to HUD to provide TBRA for more than three months.</li> <li>• Activities that are categorized as public services (such as housing search, case management, housing counseling, and health and welfare services) are subject to a 15% cap.</li> <li>• Services funded with CDBG-DR must be either new services or quantifiable increases in existing service.</li> <li>• Public facilities must be owned by a unit of government or a private non-profit to qualify for CDBG-DR. Davis Bacon, Section 3, and Environmental Review are all required.</li> <li>• Permanent Supportive Housing is categorized as rental housing.</li> <li>• Acquisition of land, site improvements, construction, and rehab will trigger additional Federal requirements such as Davis Bacon, Section 3, and Environmental Review. Learn more about these requirements on the <a href="#">CDBG-DR webpage</a>.</li> </ul>



# DISASTER RECOVERY Homelessness Toolkit



## RECOVERY GUIDE

How to Access	Eligible Activities	Notes
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### Social Services Block Grant (SSBG) – Disaster Supplemental

The U.S. Department of Health and Human Services (HHS) provides supplemental funds to support disaster response and recovery under its Social Services Block Grant Program (SSBG). Similar to CDBG-DR, the state will submit a plan for the use of funds for HHS review and approval. For activities deemed ineligible by HHS, the grantee may request a waiver.

To access these funds, communities should contact the state's [SSBG Contact](#). It is usually the State Department of Health and Human Services.

Additional information is available on the HHS website at the [SSBG page](#).

- **Reimbursement to community agencies** for services related to disaster response and recovery.
- **Administrative costs** related to planning, evaluation, training, training of personnel, and overhead costs of providing services.
- **Food assistance.** Funds can be used to supplement the state's system for providing food to needy families – i.e. food cards (if in the state's Intended Use Plan).
- **Services.** SSBG funds are available to local agencies to provide services including:
  - Congregate meals
  - Temporary housing
  - Rental assistance
  - Independent and transitional housing
  - Case management
  - Information and referral
  - Counseling services
  - Health care and behavioral health services
  - Substance abuse services
  - Residential treatment services
  - Child care services
  - Legal services
  - Transportation services
- **Buildings and systems.** Grants to local agencies to improve infrastructure
  - Communications and data sharing system
  - Renovation, repair, and rebuilding of storm damaged social service facilities

- Communities can request extension of assistance based on documentation of ongoing need for eligible services.
- Some activities may require a waiver from HHS.
- Activities involving construction or repair of facilities may be subject to other cross cutting federal requirements.
- For any repair, renovation or rebuilding, states must have procedures for verifying that costs are not reimbursable through FEMA disaster assistance, under a contract for insurance, or by self-insurance.

### FEMA Individual Assistance

FEMA funds individual assistance post disaster to provide temporary housing and address emergency needs. These funds are provided directly to individuals through a state or local Office of Emergency Management.

To access these funds, contact your state or local [Office of Emergency Management](#).

More information about this program is available on the FEMA website on the [Individual Disaster Assistance page](#).

- **Temporary housing.** This program provides individuals with vouchers or government provided housing.
- **Personal needs.** This program provides funds to individuals to cover costs to address needs caused by disasters such as: child care; damage to an essential vehicle; medical, dental, and funeral costs; personal property; transportation; and limited lodging expense reimbursements.

FEMA's intent is to restore the household to its pre-disaster condition, and thus is of limited usefulness to those experiencing homelessness prior to the disaster. States may request an extension of deadline for assistance based on continuing need.



# DISASTER RECOVERY Homelessness Toolkit



## RECOVERY GUIDE

How to Access	Eligible Activities	Notes
---------------	---------------------	-------

### FEMA - Community Services

<p>FEMA works with the Substance Abuse and Mental Health Services Administration (SAMHSA) through an interagency agreement to provide technical assistance, consultation, and training for state and local mental health personnel, grant administration, and program oversight.</p> <p>To access these funds contact your state or local <a href="#">Office of Emergency Management</a>.</p> <p>More information is available on FEMA's website on the <a href="#">Community Services page</a>.</p>	<ul style="list-style-type: none"> <li>• <b>Crisis counseling.</b> Supplemental funding for crisis counseling is available to state Mental Health Authorities through an Immediate Services Program (for up to 60 days immediately following a disaster declaration) and through a Regular Services Program (for up to nine months after the disaster declaration).</li> <li>• <b>Disaster unemployment assistance (DUA).</b> This is generally available to any unemployed or self-employed individual who lived, worked, or was scheduled to work in the disaster area at the time of the disaster and can no longer work due to the disaster.</li> <li>• <b>Disaster legal services.</b> This may include assistance with insurance claims, landlord/tenant issues, consumer protection matters, and replacement of legal documents destroyed by the disaster.</li> <li>• <b>Disaster case management.</b> The Disaster Case Management Program (DCMP) provides a time-limited partnership between a case manager and a disaster survivor to develop and carry out a Disaster Recovery Plan. This gives the survivor a single point of contact to facilitate access to a broad range of resources.</li> </ul>	<ul style="list-style-type: none"> <li>• While FEMA funds the crisis counseling programs and monitors the Immediate Services Program, FEMA has designated SAMHSA as the monitoring agency for the Regular Services Program. SAMHSA provides technical assistance on these programs as well.</li> <li>• DUA benefits are payable to individuals only for weeks of unemployment in the Disaster Assistance Period (DAP). The DAP begins with the first day of the week following the date the major disaster began and continues for up to 26 weeks after the date the disaster was declared by the president.</li> <li>• FEMA provides free legal assistance to disaster survivors through an agreement between FEMA and the Young Lawyers Division of the American Bar Association. Legal advice is limited to cases that will not produce a fee. Cases that may generate a fee are turned over to the local lawyer referral service.</li> <li>• DCMP provides funding and technical assistance to ensure the delivery of holistic services to disaster survivors including effective delivery of post-disaster case management services, partner integration, provider capacity building, and state level program development.</li> </ul>
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### FEMA Public Assistance

<p>FEMA Public Assistance provides supplemental federal disaster grant assistance to states, localities, tribes, and some nonprofits for response and recovery activities including debris removal, life-saving emergency protective measures, and the repair, replacement, or restoration of disaster-damaged publicly owned facilities, and the facilities of certain private non-profit organizations. The program also encourages protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process.</p> <p>To access these funds contact your state or local <a href="#">Office of Emergency Management</a>.</p> <p>For more information see the <a href="#">FEMA Public Assistance page</a>.</p>	<p><b>Replacement of shelters and other facilities.</b> FEMA Public Assistance funds the replacement or restoration of publically owned facilities.</p> <p><b>Improvement of shelters and other facilities.</b> The program also provides for hazard mitigation and measures to make facilities more resilient to future disasters.</p>	<p>This is a cost-share program where the state or municipality must provide a 25% match.</p> <p>Federal share is no less than 75% of eligible project costs. CDBG-DR can be used to fund the local share of the required match. Environmental Review is required. Davis Bacon and Section 3 are triggered if CDBG-DR funds are used.</p>
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# DISASTER RECOVERY Homelessness Toolkit



## RECOVERY GUIDE

How to Access	Eligible Activities	Notes
<b>Small Business Administration (SBA)</b>		
<p>The Small Business Administration provides low-interest disaster loans to businesses of all sizes, private non-profit organizations, homeowners, and renters. SBA disaster loans can be used to repair or replace the following items damaged or destroyed in a declared disaster: real estate, personal property, machinery and equipment, and inventory and business assets.</p> <p>The application is available <a href="#">online</a>, by calling 1-800-659-2955, or by emailing <a href="mailto:disastercustomerservice@sba.gov">disastercustomerservice@sba.gov</a>.</p> <p>For more information see <a href="#">Disaster Loans page</a> on the SBA website.</p>	<p><b>Repair and replacement of business assets.</b> Nonprofit service providers can obtain loans for the repair or replacement of real estate, personal property, machinery and equipment, inventory and business assets.</p>	<p>SBA funds are provided as a loan and not a grant.</p>
<b>National Voluntary Organizations Active in Disaster (VOADs)</b>		
<p>National VOAD is an association of Voluntary Organizations Active in Disaster (VOADs), organizations that mitigate and alleviate the impact of disasters. It provides a forum for promoting cooperation, communication, coordination, and collaboration; and fosters more effective delivery of services to communities affected by disasters. VOADs are more likely to be in kind services but some provide financial assistance through donations and foundation support they receive.</p> <p>To learn more about local VOADs and the assistance they provide see their <a href="#">association website</a>.</p>	<p><b>In kind support.</b> VOADs provide in kind support for:</p> <ul style="list-style-type: none"> <li>• Case management</li> <li>• Toolkits</li> <li>• Volunteer management</li> <li>• Emotional and spiritual care</li> </ul> <p>VOADs also provide support for long-term recovery groups (LRGs).</p>	<p>The National VOAD coalition includes over 50 of the country's most reputable national organizations (faith-based, community-based, and other non-governmental organizations) and 55 state/territory VOADs, which represent Local/Regional VOADs and hundreds of other member organizations throughout the country.</p>



# DISASTER RECOVERY Homelessness Toolkit



## RECOVERY GUIDE

How to Access	Eligible Activities	Notes
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<i>Entitlement Funding for Housing and Community Development (ESG, CDBG, HOME, HOPWA)</i>		
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<p>Entitlement funding provides annual grants on a formula basis to states, cities and territories for housing and community development purposes.</p> <p>To access these funds for disaster purposes, you may need to complete the following actions:</p> <ul style="list-style-type: none"> <li>Review your Consolidated Plan and Annual Action Plan to identify existing strategic/annual goals that may align with short and/or long-term recovery efforts. Determine likelihood of needing to complete substantial amendments based on allocation of resources. (Check out your Citizen Participation Plan to determine what constitutes a substantial amendment).</li> <li>Assess your allocations and uncommitted funds to determine availability of each source. Key MicroStrategy reports may be helpful: CDBG (PR-01); HOME (PR-27 and 35); ESG (PR91).</li> </ul>	<ul style="list-style-type: none"> <li><b>ESG</b> specifically funds activities to address homelessness. Key activities may include:             <ul style="list-style-type: none"> <li>Housing Relocation and Stabilization Services such as financial assistance (security deposit, utility deposit, moving costs) and service costs (Housing search and placement, legal services, credit repair)</li> <li>Rental Assistance: including short-term and medium-term rental assistance and/or rental arrears</li> <li>Street Outreach, including costs for emergency health (physical and mental) services, transportation, engagement, case management</li> <li>Essential services and shelter operations as they relate to emergency shelter (case management, childcare, job training, maintenance and security of shelter, insurance and utilities)</li> </ul> </li> </ul>	<p>Jurisdictions may ask for waivers for Entitlement programs to meet the needs of their post-disaster community.</p> <p>See additional information on <a href="#">HOME</a>, <a href="#">CDBG</a>, and <a href="#">HOPWA</a></p>
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<i>Continuum of Care (CoC) Program</i>		
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<p>The Continuum of Care Program is the federal government's largest competitive grant program, providing targeted homeless assistance grants to communities across the country. Individual grants are awarded to organizations within established Continuums of Care (CoC), a local planning body responsible for preventing and ending homelessness within a specified area.</p> <p>To learn more about HUD's CoC Program and the annual competition, go to <a href="https://www.hudexchange.info/programs/coc/">https://www.hudexchange.info/programs/coc/</a>.</p>	<ul style="list-style-type: none"> <li><b>Acquisition</b> of real property to be used to provide housing or services to homeless persons.</li> <li><b>Rehabilitation</b> of structures to provide housing or supportive services to homeless persons.</li> <li><b>New Construction</b> of a structure or building, or an addition to an existing structure, to provide housing to homeless persons.</li> <li><b>Leasing</b> of structures, portions of structures, or individual units to provide housing or supportive services to homeless persons.</li> <li><b>Rental Assistance.</b> Financial assistance up to 100% of the rent for a unit on behalf of homeless persons.</li> <li><b>Supportive Services.</b> Provision of allowable supportive services that address the special needs of program participants.</li> <li><b>Operating.</b> Day-to-day operation of housing for homeless persons.</li> <li><b>HMIS.</b> Costs of contributing data to the CoC-designated Homeless Management Information System.</li> <li><b>Administration.</b> Costs associated with planning and executing activities.</li> </ul>	<ul style="list-style-type: none"> <li>The annual competition occurs only one time per year and decisions of which projects to request from HUD must be decided locally.</li> <li>There are limitations on the types of new projects that can be requested each year as well as additional eligibility requirements provided in each year's Notice of Funding Availability.</li> <li>Eligible project types include Permanent Supportive Housing, Rapid Re-Housing, Transitional Housing, Supportive Services Only, HMIS, and Homelessness Prevention.</li> <li>All grant funds must be matched with an amount no less than 25% of the awarded grant amount (excluding the amount awarded to the leasing budget line item) with cash or in-kind resources. Match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources.</li> </ul>
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# Overview: Approaches to an Inclusive Recovery

The recovery effort will supplement the community's existing funding (e.g. HOME, CDBG, CoC, ESG, LIHTC) with new disaster recovery resources (FEMA, CDBG-DR, SBA, long-term recovery groups) to scale up existing housing and service programs (such as housing vouchers and supportive housing) and where necessary develop new ones, including development of new housing and facilities. The infusion of recovery resources provides many opportunities; the challenge can be using each source for its best use for those most vulnerable populations in the community. Many supplemental disaster funds have waiver authority, so you can be creative in your use of these funds. Also, consider your current funding programs and their unused funds to see if they can be adapted or modified for a more pressing use.

See the [CDBG-DR Toolkits](#) for guidance on disaster program designs. Also see program designs in this toolkit for:

- [Tenant Rental Assistance](#)
- [Homeless Preference](#)

## BE PREPARED TO MAKE THE CASE FOR INVESTMENTS THAT ADDRESS HOMELESSNESS

### Investments in reducing homelessness yield returns.

Investments in affordable housing may seem costly, compared to the cost of repairing or rebuilding homeless shelters. However, research shows significant costs associated with people living in shelters and on the streets. Emergency room visits and hospitalization, medical treatment, police interventions, court costs and incarceration, as well as emergency shelter expenses are all costs borne by taxpayers. When seen in this light, an investment in transitional and permanent housing options is attractive. Learn more about the [costs of homelessness](#).

While the effects of the disaster are often severe for people experiencing homelessness, their need for housing and services may be overshadowed by the businesses, landlords, and homeowners, who tend to have more political voice. A healthy recovery requires an investment in housing and services for people experiencing homelessness and very low-income people, even when those investments reduce the funds available in other areas. All stakeholders – local officials, agency staff, the service provider network, and others – must be prepared to articulate and defend the value of investments, in terms of lives saved, equity, quality of life, and long-term cost savings.



## BUILD INCLUSIVE PROGRAMS

Remember that people experiencing homelessness and other vulnerable people may face barriers to participation in disaster recovery programs. These barriers can cause precariously housed people to slip into homelessness and households experiencing homelessness to fall deeper into crisis.

### **Adopt a community-wide Housing First orientation to assist people experiencing homelessness.**

Housing First aims to remove barriers to housing for people experiencing homelessness by eliminating preconditions, such as sobriety, treatment, or service participation requirements. This approach assumes that supportive services are more effective in addressing needs when the individual or family is housed and the daily stress of being homeless is taken out of the equation. This strategy has increased urgency in a stressful post-disaster environment. See the guidance on [Housing First](#).

**Market disaster recovery programs to households experiencing homelessness and other hard-to-reach populations.** Make sure that all disaster recovery programs in our community have active outreach components to engage hard-to-reach populations.

- Involve your disaster case managers and partner with your CoC to find and inform people experiencing homelessness about new housing opportunities.
- Ensure your recovery outreach plan includes provisions for outreach to hard-to-reach populations including people experiencing homelessness or precariously housed.
- Use the CoC's coordinated entry process to ensure that no matter where a person experiencing homelessness enters the system, they are assessed and connected to appropriate housing and services.

**Establish set asides and homeless preferences in rental housing.** HUD-funded public housing units, housing choice vouchers, and multifamily properties have flexibility for homeless preferences. For example, ten percent of units in a property can give preference to people experiencing homelessness for the first sixty days of the lease-up period or each third unit that becomes vacant could be allocated to a homeless preference.

- In rental properties developed with recovery funds, reserve a portion of units for persons experiencing homelessness. Hold these units for a specific time period before opening them to other eligible renters.
- See the [guidance on establishing homeless preference](#).

**Recruit very low-income people and people experiencing homelessness into jobs programs.** Leverage key disaster projects to provide jobs for very low-income people, including those experiencing homelessness.

- Link construction, infrastructure, and economic development projects to job training programs.



- ❑ Ensure active recruitment for very low-income residents and people experiencing homelessness.
- ❑ Work with job placement centers to focus on opportunities for people experiencing homelessness.

## ADDRESS BROAD NEEDS IN RECOVERY PLANS

A successful recovery addresses the effects of the disaster to property and community. This means implementing a broad spectrum of housing and service programs that address the impacts of the disaster beyond the loss of property. Programs should address ancillary impacts of the disaster, such as the loss of community, transportation, jobs, and services. CDBG-DR grantees are not limited to returning to pre-disaster conditions. In fact, HUD directs grantees to carry out activities in a way that meets the full needs of their post-disaster population. Ultimately, a successful recovery allows all former residents to return to a stronger and more resilient community.

See [Addressing Homelessness in Your Action Plan](#) for step-by-step guidance.

**Use the CDBG-DR needs assessment to measure the full gap in housing.** This requires an evaluation of all housing needs – interim and permanent, owner and rental, single-family and multifamily, affordable and market rate – and identifying the gap in affordable pre-disaster housing that caused people to be precariously housed or experience homelessness. Additionally, the assessment requires an evaluation of the various funding sources that are covering the gap, and what remains ‘unmet.’ This unmet need is the gap in funding CDBG-DR addresses.

**Articulate a strategy to address homelessness in the Action Plan.** The Action Plan must describe the grantee’s plans to encourage housing for all income groups and the specific activities to address the transitional housing, permanent supportive housing, and permanent housing needs of individuals and families that are experiencing and at-risk of homelessness. Strategies can include a mix of approaches [including tenant rental assistance](#) and [homeless preference in multifamily housing](#).

### CDBG-DR Grantees Must Address Homelessness

The CDBG-DR program directs grantees to incorporate measures in its recovery programs to address homelessness and supportive services. As first seen post Hurricane Sandy, FR Notices on CDBG-DR Allocations include several provisions that require consideration of vulnerable populations and allow the necessary flexibility to include responsive programs.

- The needs assessment requires an evaluation of housing needs including interim and permanent, owner and rental, single-family and multifamily, affordable and market rate, **and housing to meet the needs of people who were experiencing homelessness before the disaster.**
- The Action Plan must also include descriptions of how the grantee will promote the provision of housing for all income groups and the activities planned to address the transitional housing, permanent supportive housing, and permanent housing needs of individuals and families that are experiencing and at-risk of homelessness. The grantee must also describe its planned activities to prevent low-income individuals and families from becoming homeless.

Grantees are not limited in their recovery to returning to pre-disaster conditions. Rather, HUD encourages grantees to carry out activities in such a way that not only addresses the disaster-related impacts, but leaves communities positioned to meet the needs of their post-disaster population, economic, and environmental conditions.



# Strategy: Use a Housing First Approach in Response and Recovery

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing without service participation requirements, preconditions, or barriers to entry, such as sobriety or income requirements. Supportive services are offered to maximize housing stability—not to address predetermined treatment goals prior to permanent housing entry. This approach assumes that supportive services are more effective in addressing the needs of an individual or family when the daily stress of being homeless is taken out of the equation. Key components of this model include a simple application process, a harm reduction approach, and no unnecessary conditions of tenancy beyond those required by the lease or by regulation. Although generally thought of as an approach specific to permanent housing, [HUD](#) and the [U.S. Interagency Council on Homelessness](#) have strongly encouraged emergency shelters and transitional housing programs to adopt this approach by providing low-barrier access and assistance.

In a post-disaster environment, implementation of a community-wide Housing First orientation can reduce barriers for entry into shelters or housing for people experiencing homelessness and allow the community to move people into housing more quickly. The core components of Housing First include:

- **Few to no programmatic prerequisites to permanent housing entry.** People experiencing homelessness are offered assistance with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or compliance with a treatment regimen. For example, people are not required to enter a transitional housing program to enter permanent housing.
- **Low barrier admission policies.** Admissions policies are designed to screen-in rather than screen-out applicants with the greatest barriers to housing, such as no or very low income, poor rental history, past evictions, or criminal histories. Housing programs may have tenant selection policies that prioritize people who have experienced homelessness the longest or have the highest service needs demonstrated by vulnerability assessments or the high use of crisis services.
- **Rapid and streamlined entry.** Many people experiencing homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. In order to ameliorate this, emergency shelter or housing programs following a Housing First approach make efforts to help people experiencing homelessness access assistance as quickly as possible, streamlining application and approval processes, and reducing wait times.



- **Supportive services are voluntary, but can and should be used persistently to engage participants.** Supportive services are proactively offered to help tenants achieve and maintain housing stability, but participants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.
- **Participants have full rights, responsibilities, and legal protections.** The ultimate goal of the Housing First approach is to move people out of unsheltered locations as quickly as possible while helping them ultimately achieve long-term housing stability in permanent housing. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants' apartments without tenants' knowledge and permission except under legally-defined emergency circumstances.
- **Practices and policies to prevent termination and evictions.** Housing First programs should incorporate practices and policies that prevent termination or eviction of participants. For instance, program policies consistent with a Housing First approach do not consider alcohol or drug use in and of itself to be programmatic violations, unless such use results in disturbances to neighbors, other residents, or associated with illegal activity (e.g., selling illegal substances). Housing First models may also have policies that give tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant's income. For example, to avoid eviction proceedings due to missed rent payments, programs may allow tenants to enter into payment installment plans for rent arrearages, or offer money management assistance to tenants.
- **Applicable in a variety of program models.** The Housing First approach can be implemented in different types of settings, including: scattered-site models in private market apartments, with rental assistance and access to mobile and site-based supportive services; single-site models with congregate living areas or individual units and tenants have access to voluntary on-site services; and set-asides, where supportive services are offered to participants in designated units within affordable housing developments.



# Strategy: Address Homelessness in Your CDBG-DR Action Plan

HUD expects CDBG-DR Action Plans to address the impacts of the disaster on vulnerable populations, including people experiencing homelessness or at risk of homelessness. Perform the following steps to complete the necessary analysis, planning, and determination of funding for activities that will assist this population. **HUD might not approve action plans that do not adequately address the needs of persons experiencing homelessness both pre- and post-disaster.**

## *Step 1. Understand the Requirements*

All CDBG-DR grantees are required to specifically address how its programs will promote housing for vulnerable populations including people experiencing homelessness or at risk of homelessness. (Consult the [Action Plan Review and Certification Checklist](#) related to the disaster event for more information.)

- **Disaster and Unmet Needs Assessment (Needs Assessment).** To inform the Action Plan, the Needs Assessment must address housing including: interim and permanent; owner and rental; single family and multifamily; affordable and market rate; and housing to meet the needs of persons experiencing homelessness prior to the disaster.
- **Action Plan Activities.** The Action Plan must include descriptions of activities that address:
  - The transitional housing, permanent supportive housing, and permanent housing needs of individuals and families (including subpopulations) that are experiencing homelessness and at risk of homelessness;
  - The prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless; and
  - The special needs of persons who are not homeless but require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents).

In short, an Action Plan does not meet HUD's standards if it does not include provisions for the housing and service needs of people experiencing or at risk of homelessness or if it only addresses short or intermediate needs.



## *Step 2. Include Homelessness in the Unmet Needs Assessment Section of Your Action Plan*

The [Disaster and Unmet Needs Assessment Kit](#) in the CDBG-DR Toolkit provides a methodology for conducting the full analysis. To ensure that the needs of people experiencing homelessness are incorporated into this analysis, you must look beyond damage assessments and collect both quantitative and qualitative data about the numbers and characteristics of people in the community who were experiencing homelessness. Much of this data has likely been collected and analyzed by entities in your community already, including your CoC, city agencies, and local policy and advocacy groups. See this [checklist](#) for more information on collecting and analyzing data about homelessness in your needs assessment.

## *Step 3. Address Homelessness in the Funding Allocation Section of Your Action Plan*

CDBG-DR funds allow a variety of eligible activities that can meet the needs of people experiencing or at risk of homelessness and per HUD guidance, these must be considered in your allocation of funds. Consider the following questions as you contemplate the activities you will fund:

- How can programs be designed to ensure households experiencing homelessness are aware of and have access to programs and services?
- What wrap-around services are needed to maximize each program's success?
- How can key homeless concepts, such as Housing First, be embedded in all housing program designs?
- How can current homeless programs be adapted for a post-disaster environment?
- As disaster response programs ramp down, what are the effects on people experiencing homelessness and the existing programs that serve them?

See this [checklist](#) for a methodology and a [detailed list](#) of CDBG-DR eligible activities that can address homelessness.



# Checklist: Ensure the Inclusion of Homelessness in the CDBG-DR Action Plan

The Action Plan must address homelessness in the unmet needs assessment and in the [funding allocation](#) sections.

## UNMET NEEDS ASSESSMENT

The unmet needs assessment determines the needs that remain after the response effort. It informs your decisions about allocating limited CDBG-DR funding toward the areas of greatest need. To ensure that your unmet needs assessment includes the needs of people experiencing or at risk of homelessness, take the actions listed below.

### *Action 1. Assess the Current Situation*

*Collect and analyze data on the current situation. Most of this data can be collected from your CoC using data from the Homeless Management Information System (HMIS), your community's last Point in Time (PIT) Count, your Consolidated Plan, and census data.*

- 
- Gather the pre-disaster baseline data.** Access the data that was collected prior to the disaster on homelessness in your community. This will be helpful in assessing longstanding needs that require attention. Collect data on:
    - The scope and nature of homelessness in your community
    - Households at risk of homelessness
    - Housing stock and gaps in affordable housing
    - Support services for homelessness prior to the disaster

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  - Gather data on current conditions.** Consult with emergency personnel and the CoC to gather qualitative and quantitative data on the impact of the disaster on people who were experiencing homelessness or at risk of homelessness prior to the disaster.

Data must include community input on how the disaster impacted households experiencing homelessness. Consider:

    - Where are people who were experiencing homelessness prior to the disaster being sheltered? In what conditions?
    - What is the status of pre-disaster arrangements? For example, are emergency shelters operational? Were encampments destroyed? Were temporary housing options such as motels impacted?
    - Have the numbers of people experiencing homelessness increased as people who were previously precariously housed have become homeless?
    - Have service providers seen a surge in need for shelter, food, services? Can they quantify that need?
-





- 
- Identify indirect impacts on persons experiencing homelessness or precariously housed.** In gathering data about current conditions, consider the impacts of these conditions. Beyond loss of emergency shelters, what other impacts have people experiencing homelessness encountered? Consider:
    - Impacts on health associated with loss of foodbanks, health clinics, substance abuse treatment, and other such services
    - Loss of income associated with disruptions to employment caused by business losses or inaccessibility of work (loss of transportation or childcare)
    - Loss of belongings, including identification and other crucial documents that can impact ability to access resources
    - Instability created by loss of services, schools, and social networks

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  - Consider the effects of ongoing response and recovery work.** As you begin to analyze the data collected to inform your estimation of unmet needs, take stock of ancillary impacts of response efforts.

Consider how short-term recovery efforts have affected people who were experiencing homelessness and the service sector that supports them.

    - Have disaster shelters alleviated a shortage of shelter space? What will happen when those shelters close?
    - Have households experiencing homelessness fled to surrounding communities? To what degree are those households returning to the community?
    - To what extent will emergency and social services remain and for how long?
    - To what extent has the service network re-built its capacity? Are there still response initiatives in place that can help individuals with long-term recovery?

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  - Identify Funding Sources.** Assess the resources available to address the needs identified.
    - Identify funding in the community being used to provide shelter or services to people experiencing homelessness.
    - Identify additional sources of funding that could be allocated to meet these needs.
    - See [Summary of Funding Sources for Housing and Services after a Disaster](#) for a list of sources to consider.
- 

## Action 2. Estimate Unmet Needs

*Use data collected and analyzed to determine and codify the needs of people experiencing homelessness that have not been met through other programs and interventions.*

- 
- Calculate unmet needs.** Identify service and housing needs not met by other funders. CDBG-DR allows grantees to establish programs that re-build in a resilient manner for future disasters. This gives the grantee latitude to identify broad needs that may not have been met before such as:
    - Emergency shelters, food banks, medical services, and other services
    - Permanent supportive housing, tenant assistance, and other housing supports

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  - Summarize your analysis in the Needs Assessment section of your CDBG-DR Action Plan.** Include descriptions of:
    - The scope and nature of homelessness in your community pre-disaster and how that has changed post disaster.
    - Affordable housing stock and the types and numbers of housing needed to achieve housing for all residents.
    - Type and breadth of services needed to ensure that people experiencing homelessness and people at risk of homelessness have access to stable housing.
-



## FUNDING ALLOCATION

The Funding Allocation section of the CDBG-DR Action Plan gives HUD and the public a high level overview of what programs and projects you plan to undertake with CDBG-DR funding. You will use the information collected in your Unmet Needs Assessment to determine local capacity, prioritize needs, and articulate a vision for the programs and projects that you want to fund with CDBG-DR funds.

### *Action 3. Determine Capacity*

- 
- Identify your long-term post-disaster service network and stakeholders.** Consider those with specific skills in the areas needed to address the needs of people experiencing homelessness.
    - These may include your existing CoC, Voluntary Organizations Active in Disaster (VOADs), housing finance agencies, housing counseling agencies, and community health centers.
    - Work with these organizations to determine their interest in and capacity to support CDBG-DR program activities.
  - Consider their capacity to carry out long-term disaster programs.** Assess the depth, breadth, skills and availability of the stakeholders identified and consider what they need to meet the needs and potentially expand capacity. Consider:
    - Will they need to train existing staff, hire new staff, or develop new partnerships?
    - Will they need new IT systems? More space? Other investments?
    - What support – financial and skills-based – will they need from your agency to carry out an expanded mission and meet current needs?
- 

### *Action 4. Prioritize Needs and Develop Responses*

- 
- Develop programs and projects based on an unmet needs analysis with an emphasis on meeting the needs of those experiencing homelessness or those at risk of homelessness.** Determine how and how much CDBG-DR funding will be allocated to addressing unmet needs of those experiencing homelessness or at risk of homelessness.
    - Based on available capacity, unmet needs assessment, and strategic priorities for finite CDBG-DR funding, determine which programs and projects to fund.
    - Obtain feedback from impacted partners and localities to ensure that the proposed program or project will meet stated need.
    - For programs and projects that you can fund to address homelessness issues post disaster see [Overview of CDBG-DR Programs for Homelessness](#).
  - Include descriptions of your homelessness programs and projects in the Funding Allocation section of your CDBG-DR Action Plan.** For all programs and projects you fund, your Action Plan must include high level overview of proposed activities, including:
    - Use of funding including proposed activity, budget, and geographic area
    - Entity administering program or project
    - Eligible CDBG-DR activity and national objective for the program or project
    - Threshold factors or applicant eligibility criteria, grant size limits, and proposed start and end dates
    - How the projected use of funding relates to a specific impact of the disaster and will result in long-term recovery
    - Estimated and quantifiable performance outcomes relative to the identified unmet need
-



# Overview of CDBG-DR Eligible Activities for Homelessness

Activity	Program Overview	Design Considerations for Post-Disaster Scenario
<b>PUBLIC SERVICES</b> <i>Unless waived, the total amount of funding allocated to Public Services activities cannot exceed 15% of the total CDBG-DR appropriation. (Eligible Activity: Section 105(a)(8), National Objective: LMI Limited Clientele)</i>		
<u>Tenant Based Rental Assistance (TBRA)</u>	Rental subsidy to help households afford housing costs such as rent and security deposits to make units affordable to low-income people following a disaster	<ul style="list-style-type: none"> <li>• May require a waiver from HUD so the program can be funded for longer than the 3 months allowed under CDBG.</li> <li>• Can be used on its own or in conjunction with other activities such as rapid rehousing and rental development.</li> <li>• Rapid Rehousing can be used as a strategy combining TBRA along with case management services and rent and move-in assistance to help individuals and families move quickly into housing. This strategy can be adapted to a post-disaster market to help families displaced by the disaster regain their stability and avoid prolonged homelessness.</li> </ul>
<b>Emergency Assistance Payments</b>	Similar to TBRA, can use CDBG-DR funding to help tenants remain in their homes by paying for utilities and related housing costs	<ul style="list-style-type: none"> <li>• May require a waiver from HUD so the program can be funded for longer than the 3 months allowed under CDBG.</li> <li>• Applicants are likely to need support throughout the process.</li> <li>• Quick ramp up is imperative.</li> <li>• Marketing to landlords won't ensure the homeless community is aware of the program: additional outreach will be required.</li> </ul>
<b>Housing Counseling</b>	Assist with housing search and identification of permanent affordable housing alternatives	<ul style="list-style-type: none"> <li>• Typical housing counseling services, such as homebuyer or foreclosure prevention, can be greatly expanded post disaster such as coordinating with case management agencies, recognizing and avoiding scams, connecting individuals to and applying for relief efforts, etc.</li> <li>• Ensuring strong connections between counseling agencies with homeless providers may afford the opportunity for more intensive and long-term engagement with households, and allow agencies to act more like case management for housing issues than typical housing counseling tied to a single transaction.</li> </ul>
<b>Job Training</b>	Help individuals gain the skills necessary to obtain employment	<ul style="list-style-type: none"> <li>• Can be paired with recovery programs to provide job opportunities for unemployed and underemployed.</li> </ul>
<b>Childcare</b>	Cover child care expenses that may prevent individuals from obtaining employment and going to work	<ul style="list-style-type: none"> <li>• Individuals may not be able to pay for childcare services or may not have access to the same childcare services available to them prior to the disaster.</li> </ul>
<b>Healthcare</b>	Cover healthcare related expenses	<ul style="list-style-type: none"> <li>• Individuals may not have access to the same healthcare services available to them prior to the disaster and healthcare conditions may be exacerbated by the disaster event.</li> </ul>



# DISASTER RECOVERY Homelessness Toolkit



## RECOVERY GUIDE

Activity	Program Overview	Design Considerations for Post-Disaster Scenario
<b>Drug abuse counseling and treatment</b>	Address need for counseling and treatment	<ul style="list-style-type: none"> <li>• Drug abuse may increase after a disaster due to trauma. CDBG-DR funds can be used to pay for substance abuse services including counseling and treatment.</li> </ul>
<b>Case Management</b>	Provide full spectrum of case management services to help individuals gain access to jobs, housing, and associated services	<ul style="list-style-type: none"> <li>• After a disaster, long-term case management for individuals and households experiencing homelessness is imperative to help navigate the various housing options and relief services, referrals to entities that can support trauma-induced issues, and connecting back to the CoC network.</li> <li>• Most disaster projects and programs will need a case management or housing counseling element to ensure accessibility by the homeless community.</li> <li>• Rapid Rehousing can be used as a strategy combining case management services with Tenant Based Rental Assistance. This strategy can be adapted to a post-disaster market to help families displaced by the disaster regain their stability and avoid prolonged homelessness.</li> </ul>

### PUBLIC FACILITIES

*Must be owned and operated by local government or nonprofit (Eligible Activity: Section 105(a)(2), National Objective: LMI Limited Clientele, LMI Area Benefit, Urgent Need)*

<b>Emergency Shelter</b>	Establish shelters to serve as overnight residences for households experiencing homelessness	<ul style="list-style-type: none"> <li>• After a disaster there may be a need to repair existing emergency shelters, expand them, or build new ones. CDBG-DR funds can be used to pay for these activities.</li> </ul>
<b>Disaster Shelter</b>	Establish shelters to serve households that lost their homes due to disaster until they can find alternative housing or repair their damaged housing	<ul style="list-style-type: none"> <li>• Investments of CDBG-DR funds in disaster shelter can relieve pressure on the community's emergency shelter system.</li> <li>• Disaster shelters must have clear exit strategies for individuals and households experiencing homelessness to support the transition to permanent housing.</li> </ul>
<b>Transitional Housing</b>	Provide temporary housing for households who may need additional stabilization supports before moving into permanent housing.	<ul style="list-style-type: none"> <li>• Transitional housing can be most effective for survivors of domestic violence; unaccompanied youth, including pregnant or parenting youth; or individuals in early recovery from a substance use disorder who may desire more intensive supports.</li> </ul>

### RENTAL HOUSING

*Can be developed to alleviate housing needs post disaster. Does not have to be a one for one replacement of damaged units. (Eligible Activity: Acquisition of real property, Section 105(a)(1) or Clearance, rehabilitation, reconstruction, and construction of buildings (Including housing), Section 105(a)(4), National Objective: LMI Housing)*

<b>Acquisition of rental housing</b>	Acquire existing rental housing that can be converted into housing units for low- and moderate-income households	<ul style="list-style-type: none"> <li>• <b>Homeless Preference</b> can be used in existing or new rental developments to ensure that units that become available in the competitive post-disaster housing market are accessible to people experiencing homelessness.</li> <li>• <b>Housing First</b> approach shall be deployed to minimize the barriers for households and individuals experiencing homelessness in accessing these housing options.</li> </ul>
<b>Rental housing construction and/or rehabilitation</b>	Construction or rehabilitation of rental housing for low and moderate-income households that can replace damaged rental housing stock and get	



# DISASTER RECOVERY Homelessness Toolkit



## RECOVERY GUIDE

Activity	Program Overview	Design Considerations for Post-Disaster Scenario
	formerly homeless individuals permanently housed	
<b>Permanent Supportive Housing</b>	Construction or rehabilitation of affordable housing offered in combination with supportive services	<ul style="list-style-type: none"> <li>• This helps serve low-income populations that also have co-existing complex needs such as physical disabilities, mental health, and/or drug addiction issues.</li> <li>• Similar to other types of rental housing programs, <a href="#">Homeless Preference</a> can be used to ensure that units that become available in the competitive post-disaster housing market are accessible to people experiencing homelessness.</li> </ul>
<b>Rapid Re-Housing</b>	A model of permanent housing that provides short- and/or medium- term rental assistance and supportive services to help individuals and families achieve and maintain housing stability as quickly as possible	<ul style="list-style-type: none"> <li>• Rapid re-housing helps homeless individuals and families solve the practical and immediate challenges to obtaining permanent housing while reducing the amount of time the experience homelessness. CDBG-DR funds may be used to pay for rental assistance, services, and other costs to rapidly re-house individuals or families after disasters.</li> </ul>



# Homeless Preference in Multifamily Housing

A homeless preference in HUD-assisted multifamily housing can increase access to available housing units for people experiencing homelessness including post disaster.

## WHAT IS A HOMELESS PREFERENCE IN MULTIFAMILY HOUSING?

The multifamily homeless preference is an optional, owner-adopted preference that applies to HUD-assisted multifamily housing with project-based Section 8 or PRAC rental subsidy. The homeless preference impacts the order in which applicants are selected from the wait list, allowing families and individuals experiencing homelessness to move quickly to the top of the list. The property eligibility and screening criteria remain the same after a homeless preference has been adopted. In the past, affordable multifamily housing was generally filled through waiting lists of income-qualified households without regard to whether such households were homeless or in the process of leaving homelessness. In July 2013, HUD issued a notice<sup>1</sup> to allow for owners to adopt, with HUD approval, admissions preferences for households experiencing homelessness. Owners are given wide latitude in tailoring preferences both with regard to who is served and what percentage of units or vacancies are subject to the preference.

## HOW COULD WE IMPLEMENT A HOMELESS PREFERENCE AFTER A DISASTER?

Grantees should work directly with local HUD office to take the steps below and expedite approval of a change in the tenant selection plan.

- **Identify and engage HUD-assisted multifamily housing owners and property managers.** Communities will want to leverage established relationships with landlords but also identify new landlord participants through active outreach. The local HUD office will have a list of HUD-assisted

<sup>1</sup> Notice H 2013-21 “Implementation and approval of owner-adopted admissions preferences for individuals or families experiencing homelessness” (see Attachment A: Notice H 2013-21).



multifamily housing in your area. Participate in community meetings, make calls, and contact associations. See [the sample outreach email](#) to support your outreach calls and meetings.

- **Work with CoCs to identify service providers.** Owners and property managers may be more interested in housing this population if you can provide supportive services through existing providers.
- **Modify the tenant selection plan.** If the property currently has a waiting list, the owner must modify the tenant selection plan. Decisions to be made include the population that will benefit from the preference, as well as the preference rate. Post disaster, it may be appropriate to fill the next X number of vacancies with people experiencing homelessness displaced by the disaster. See [Suggested Model Language](#) for template.
- **Assist owners/property managers with HUD submission.** Owners will need to submit the plan to HUD for approval and begin necessary steps to identify potential preference applicants. They will need to review the affirmative fair housing marketing plan for any changes that might be needed. Once the amended tenant selection plan is approved by HUD, the owner/property manager needs to notify everyone on the waiting list if one exists.
- **Identify eligible households.** Work directly with the Continuum of Care. The coordinated entry process should have identified individuals and households waiting for housing placement.
- **Assist households with the application process.** Consistent with a housing first approach, reduce the barriers for the persons experiencing homelessness. Assist them in completing applications and in working with landlords to minimize requirements such as a driver's license or credit rating.

## MORE ON HOMELESS PREFERENCE IN MULTIFAMILY HOUSING

HUD has [resources](#) available for property owners and managers as well as a [toolkit](#) that provides templates to assist in implementation. The [HUD Notice](#), "Implementation and approval of owner-adopted admissions preferences for individuals or families experiencing homelessness" is also available online.



# Suggested Model Language for Adopted Admissions Preferences for Individuals and Families Experiencing Homelessness

*[Name of owner/ corporation]* is adding a homeless admissions preference to all of its HUD-assisted housing in accordance with Housing Notice 2013-21 “Implementation and Approval of Owner-Adopted Admissions Preferences for Individuals or Families Experiencing Homelessness.” This amendment establishes an admissions preference for individuals and/or families who meet HUD’s definition of homeless as provided in HUD regulations at 24 CFR Part 578.

Please select as many as applicable. May select “all” or “other” with definition:

Paragraph 1 of the definition of homeless:

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designed to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Paragraph 4 of the definition of homeless:

Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.





- Homeless veterans
- Homeless families with children
- All
- Other \_\_\_\_\_

This admissions preference will include the following:

It will be effective [insert date] \_\_\_\_\_ and/or when approved by HUD.

The current waiting list for each property will be maintained consistent with HUD Handbook 4350.3 "Occupancy Requirements of Subsidized Multifamily Housing Programs" guidelines and the property's Affirmative Fair Housing Marketing Plan (AFHMP).

Current persons on the waiting list will be notified of the new admissions preference and will be instructed on the necessary procedure to qualify. They will be granted a first right to an available unit under the preference should they meet the above definition of homeless. Notice to persons on the waiting list will be done by mail thirty (30) days prior to adoption of the preference.

Upon unit turnover, one in every \_\_\_\_\_ vacancies will be offered to a person who meets the criteria of the admissions preference and who is on the existing waiting list or who is referred to the respective property by an organization that refers people transitioning out of a shelter or temporary housing program. OR Upon unit turnover, \_\_\_\_\_ vacancies will be offered to a person/household who meets the criteria of the admissions preference and who is on the existing waiting list or who is referred to the respective property by an organization that refers people transitioning out of a shelter or temporary housing program. These vacancies will be filled sequentially.

Referrals for available units will be accepted from \_\_\_\_\_ [insert organization names; owner/management choice], pursuant to paragraph V (d) of Housing Notice 2013-21. All applicants must comply with current admissions requirements at the specific property, including income, age, and criminal/credit screening criteria. Applicants who are denied will be provided with the basis of the denial in writing and notified of their right to request a meeting to dispute the rejection.

This preference can be amended as needed and/or removed with proper notification of such to all affected parties, including written notification to HUD.



# Sample Landlord Outreach Email for Homeless Preference (Post Disaster)

Dear (Contact from apartment association, landlord group, or housing coalition),

Following the effects of (named storm/disaster event), our community is in need of safe, secure, and affordable housing to assist our friends and neighbors who were displaced by (named storm/disaster event) and are experiencing homelessness. Our community is providing financial support and case management to tenants who face barriers to housing. As a landlord, you can support this effort by granting admission preference to individuals and families experiencing homelessness. While it can feel like a risk to rent to a tenant with barriers to housing, the financial support and case management services provided by our community's supportive housing program ensure that tenants and landlords alike are supported by our participating agencies.

**Benefits.** Landlords find the following benefits from program participation:

- Easier intake. A coordinated system of service providers help to complete tenant applications.
- Tenant management. Partner agencies support tenants and reduce turnover.
- Lower vacancy rates. Consistent referrals and lower tenant turnover reduce vacancies.

**How it works.** The Homeless Preference in multifamily housing works as follows:

- Individuals and families who are experiencing homelessness are referred to coordinated entry for assessment of their housing needs and are referred to an agency.
- The agency works with the individual or family to identify a unit that meets their needs.
- The agency supports the individual or family in meeting the landlord's screening and eligibility requirements.
- While rental assistance support is not necessarily part of the Homeless Preference, there may be resources available to assist in housing placement and with security deposits and first month's rent.
- Supportive services and case management ensure that the household remains stable in housing.

(For more information the U.S. Department of Housing and Urban Development (HUD) has issued a notice on admission preference for families and individuals experiencing homelessness - *Notice H 2013-21 "Implementation and approval of owner adopted admissions preferences for individuals or families experiencing homelessness"*.)

**How you can help.** You can act right away if you have no waiting list. If there are applicants currently on your property's waiting list, you can amend your tenant selection plan to allow rental to individuals and families experiencing homelessness before other applicants. Committed community partner agencies are available to support you in locating potential residents who are homeless and in helping to maintain their successful tenancies.



## DISASTER RECOVERY Homelessness Toolkit



### RECOVERY GUIDE

Ending homelessness is an important part of our community's Consolidated Plan that addresses affordable housing and community development. The adoption of preferences is not mandatory, but using this preference is an opportunity for owners of HUD-assisted multifamily properties to be a part of our community's goals to prevent and end homelessness as we rebuild post disaster. There are resources available within the community to assist you in implementing the preference.

Since (20xx), our Continuum of Care has reduced homelessness by (##/xx%), and we could not have made this progress without the support and collaboration of valued landlord partners in the community. During this time of crisis, finding safe and secure housing for our most vulnerable citizens is of paramount importance. Please consider instituting a homeless preference in your multifamily housing to help (city/county/ jurisdiction) rebuild.

Please contact [\_\_\_\_\_] if you have any questions.

Sincerely,



# Strategy: Supporting Households Experiencing Homelessness Post-Disaster through a Tenant Rental Assistance Approach

As rental costs typically increase post disaster and the number of households needing financial housing assistance surges, communities have successfully used a tenant-based strategy to re-house and stabilize individual households so they can afford housing costs of market-rate units. For such programs to be accessible and responsive to people experiencing homelessness, the jurisdiction must undertake a comprehensive strategy to increase the number of programs that provide tenant-based housing subsidies, herein referred to as tenant assistance programs, that include direct financial assistance as well as housing identification and case management.

## WHAT ARE TENANT RENTAL ASSISTANCE PROGRAMS?

Tenant assistance programs can provide a short-, medium-, or long-term financial subsidy that eligible jurisdictions can use to help households afford rent. Typically, they provide payments to make up the difference between the amount a household can afford for housing and local rent standards and can include an option to assist tenants with utility costs and security deposits. In some cases, a program may also provide supportive services such as, but not limited to, case management and housing navigation services, tailored to the needs of the individual household. This [funding summary](#) has a detailed list of federal resources that can fund tenant rental assistance programs post-disaster and their eligible uses.

Tenant assistance programs offer flexibility that make it especially useful for helping homeless households because:

- Assistance is provided on behalf of individual households and is not tied to specific properties or units, making it easier to target towards homeless households.
- Assistance moves with the tenant. The household may take the assistance and move to another rental property as their circumstances change.
- Direct subsidy amount is adjusted to household income. The subsidy is typically based upon the income of the household, the particular unit the household selects, and the local rent standard.



## WHAT ARE THE CORE COMPONENTS OF A TENANT RENTAL ASSISTANCE PROGRAM DESIGNED TO ASSIST PEOPLE EXPERIENCING HOMELESSNESS POST DISASTER?

Post disaster, a rapid response that combines housing with services can be effective in supporting people experiencing or at risk of homelessness. The *rapid re-housing (RRH) model* provides useful guidance. HUD defines rapid re-housing as an *intervention, informed by a Housing First approach that is a critical part of a community's effective homeless crisis response system. Rapid re-housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services.* HUD's Continuum of Care (CoC) and the Emergency Solutions Grant (ESG) programs include rapid re-housing as an eligible form of assistance and give communities flexibility to tailor these programs to local circumstances.

HUD drafted a [Rapid Re-Housing Policy Brief](#) that provides an overview of the core components and practice considerations of the rapid re-housing model. USICH has a number of [featured tools](#) and resources on rapid re-housing. The National Alliance to End Homelessness has a [Rapid Re-housing resource page](#) that provides information on policy, training, and relevant research for practitioners.

Borrowing from the rapid re-housing model, recommended core program components of a post-disaster tenant assistance program include:

- **Housing Identification:** Helps households find appropriate and safe housing and address barriers to that housing. This can involve the recruitment of landlords as well as identification of individual housing opportunities, such as co-housing or moving in with family members.
- **Rent and Move-In Assistance:** Provides financial assistance to cover eligible move-in costs, deposits, and rent and utility costs to eliminate financial barriers to signing a lease.
- **Case Management and Services:** Case management and supportive services to help individuals and families select among permanent housing options, address financial issues, negotiate manageable lease agreements, make time-limited services available, and monitor housing stability. Case management often involves interactions with participants and landlords. The pairing of guaranteed rent with an agency's supportive services and case management can be a strong selling point for landlords who might otherwise not rent to tenants who have experienced homelessness, or who have other barriers.
- **Time-limited subsidy in permanent housing setting.** Provides short- and/or medium-term financial assistance allowing more households to be served than traditional permanent housing programs with



no limit on length of stay. While some persons seeking assistance will need a long-term subsidy, this will not be required for all households. A rapid re-housing model provides an important tool to communities to help homeless households get quickly back on their feet.

This [step-by-step guide](#) has detailed information to launch a tenant rental assistance program based on these core components.

## WHAT DESIGN AND IMPLEMENTATION CONSIDERATIONS ARE CRITICAL TO PROGRAM SUCCESS?

As you design a post-disaster tenant assistance program, you should not need to start from scratch. Instead, you can design your tenant assistance program expanding upon programs already in place. The CoC will have experience administering tenant-based rental assistance in both permanent supportive housing and rapid re-housing models. Further, an entity – the local public housing agency (PHA) running Housing Choice Vouchers or the local jurisdiction running a HOME TBRA – also has substantial implementation experience, processes, and procedures for administering tenant-based financial subsidies. The first step in the process should be to bring representatives with relevant experience from the CoC, the PHA, and other local agencies to design the program together to find out what is already in place and discuss possible design considerations. These considerations may include:

- **Rapid identification of vacant units.** Communities will want to leverage established relationships with landlords. This provides an opportunity for stakeholders to share information as well as identify new landlord participants through active outreach. Developing relationships with landlord associations or through a [Landlord Liaison Project](#) can increase the availability of, and access to, rental units. See a [sample email](#) that can be used for outreach.
- **Increasing Staff Capacity.** Additional staffing capacity will likely be needed, at least in the short term. Consider reaching out to neighboring communities not impacted by the disaster to see if they can identify staff that could come to your community to provide support on a short-term basis. Existing staff will likely need additional training and support to assist a greater number of homeless households following a disaster. Cross-training between CoC representatives and providers with local housing agencies and administrators will help increase long-term capacity.
- **Proactive use of data.** The CoC can use Homeless Management Information System (HMIS) data to quantify the needs of households experiencing homelessness and help design a responsive tenant assistance program. HMIS data can also be used to identify households that are nearing the end of their enrollment in a program and pursue strategies to help those households shift to appropriate new



forms of assistance. This process can free up the unit or subsidy for newly identified households experiencing homelessness after a disaster.

- **Prioritization of households.** To make the most efficient use of resources following a disaster, a community will need to determine how homeless households that were further displaced by a disaster will be prioritized for assistance. Many communities prioritize households for assistance based on length of time homeless and an overall assessment of vulnerability or severity of service needs. You will need to work with stakeholders to come up with standards for how households will be prioritized for assistance.
- **Increased mobility options.** Taking rental assistance across jurisdictions may help households following a disaster find more appropriate housing that has not been damaged by the disaster, provides greater accessibility or affordability, or better meets the household's needs and preferences. Homeless households receiving assistance with CoC Program-funded rapid re-housing and other tenant-based rental assistance may move outside of the CoC's geographic area in order to [expand their housing options](#). Although the CoC Program permits households to choose housing outside of the CoC's geographic area, other rapid re-housing funding sources might not without requesting a waiver.
- **Removal of administrative barriers.** Although most CoC-funded homeless services providers are already using a housing first approach, many PHAs and other agencies responsible for administering financial assistance may have historically had certain requirements related to things like income or criminal history. In a post-recovery tenant assistance strategy, as many barriers should be eliminated as possible to ensure that homeless households are not screened out from receiving assistance. Similarly, where permitted by programmatic regulations, an individual with no employment records, identification, and/or housing records may need to self-certify their status. Consider using a [self-certification form](#) to identify homeless households in need of assistance.



# Step-by-Step Guide: Stand-Up a Tenant Rental Assistance Program Post Disaster

## Step 1. Articulate program parameters

To determine the size and scope of your program, consider the needs of the target population, the size and nature of the need, other resources available, and the pace of recovery. You should be able to specify:

- Number of people to be served
- Budgetary requirements for each core component of your program:
  - Direct rental assistance
  - Housing identification services
  - Case management and supportive services
- Length of time program is likely to be needed at full capacity. When evaluating this point, a jurisdiction may want to consider when additional market options will be viable. Market options may include PHA units coming back online, permanent supportive housing rehabilitated, and new construction as well as employment growth.

## Step 2. Identify existing tenant rental assistance programs and potential funding sources

Look to your PHA and local agencies to find an entity with prior expertise in tenant rental assistance. Leverage their existing staff, systems, and funding to implement the program. As you assess funding options for expanding the existing program, consider the rules, regulations, and funding available for each potential source. Also consider the waiver authority that the federal government may have post disaster to allow for modifications to a program to meet post-disaster needs.

This [funding summary](#) provides a list of federal resources that can support tenant rental assistance programs post disaster. Assess the funding available to decide which source best fits your program needs. Consider:

- **Flexibility of program rules.** Some programs have more flexibility with regard to eligible applicants and timeframe for the program. Consider which sources best meet your program design. The Social Services Block Grant (SSBG), for example, allows a great deal of flexibility with regard to timeframe and eligibility.





- **Alternative uses of funds.** Some funding sources, such as CDBG-DR when available, allow for a broad range of services that may not be covered by other sources. Consider your investments in tenant rental assistance in the larger picture of your full program portfolio and consider sources that cannot be used for other activities.
- **Compatibility of funds.** If you select more than one funding source for your program, consider any potential conflicts in requirements. Work closely with your local HUD field office to make sure all requirements can be met if carried out as planned. As you implement the program, establish a clear delineation of record keeping, including financial processes, and application of regulations and policy.

### Step 3. Develop the program infrastructure

To make tenant assistance programs responsive to people experiencing homelessness you will need to adapt to the realities of post-disaster rental markets and provide additional supports for vouchers to reach your intended audience. Specifically:

- **Create an inventory of available units.** Program participants will likely need assistance to find units in the tight post-disaster housing market. Monitor housing locator, local apartment registries, local housing authority, rosters, and the local multi-list service (such as [www.realtor.com](http://www.realtor.com)) to create an inventory of available units. Some of these inventories are refreshed frequently to provide updated availability. Strategies to engage with landlords and other operators of housing resources will vary by community based on housing market conditions, size and density of the community, and other factors. The [National Alliance to End Homelessness](#) and the [United States Interagency Council on Homelessness](#) (USICH) have developed resources for landlord outreach. See a [sample email](#) that can be used for outreach.
  - **Mine your local Public Housing Authority or State Housing Finance Agencies lists.** Both of these agencies provide vouchers and likely maintain inventories of available units.
  - **Identify Housing locator services.** Many states have locator services that are maintained by the state housing finance agency or other local non-profit housing providers. If your area has been heavily impacted by the disaster, you may need to look for units in areas of less impact.
  - **Engage Housing Counseling Agencies.** Housing counseling agencies can provide assistance to identify potential rental units, case management services, and tenant workshops that help homeless households have a successful rental experience.
- **Expand the scope of the CoC's coordinated entry process.** Each CoC is required to develop and implement a [coordinated entry process](#). Having all parties participating in coordinated entry will ensure



that no matter where a household attempts to access housing and services, it will be referred to the program that is most appropriate for meeting its needs.

- **Establish traditional case management services.** Program participants are likely to need additional support beyond locating housing. Engage local service providers to work one-on-one with program participants to help them find and secure housing. Work with the CoC to determine what supportive services are already available within the community for persons experiencing homelessness.
  - **Identify tenant-specific support.** Assistance with health care, transportation, legal services, employment and other important services will improve housing stability. Support may include removal of financial barriers through rent and move in assistance as well as income stabilization through job training, educational programs, child care, and health services.
  - **Provide services to landlords.** Well-informed landlords are essential to tenant retention. Identify local housing assistance centers to provide education for landlords on the management, legal, and financial considerations associated with rental housing and serving tenants who receive TBRA.
- **Adopt program guidelines.** Adapt existing procedures and written policies as appropriate to accommodate the post-disaster program. See the [sample program guidelines](#) for a tenant assistance program post-disaster that may be used to help set or adjust policy standards for your program.
- **Request waivers.** Some funding sources may require a waiver to standard program rules. For example, CDBG-DR requires a waiver to provide more than 3 months of TBRA assistance. It is important to remember that statutory requirements may not be waived.
- **Hire and train sufficient staff.** Even if you use an existing provider to implement the tenant assistance program, the short-term demands of a post-disaster program are likely to require additional staff. Take advantage of workforce investment programs and market job openings broadly to find new staff. Provide training and support as the program ramps up.



# Sample Email: Landlord Outreach for Tenant Rental Assistance Program

*The following sample email references specific elements optional in running a post-disaster Tenant Rental Assistance program. This email template should be adapted to local circumstances, program goals, and funding requirements.*

Dear (Contact from apartment association, landlord group, or housing coalition),

Following the effects of (named storm/disaster event), our community is in need safe, secure, and affordable housing to assist our most vulnerable friends and neighbors who were experiencing homelessness and were displaced by (named storm/disaster event). While it can feel like a risk to rent to a tenant with barriers to housing, the financial support and case management services provided by our community's Tenant Rental Assistance Program ensures that tenants and landlords alike are supported by our participating agencies.

Here is how the Program works:

- Individuals and families who are experiencing homelessness are connected to a pre-screened Agency.
- The agency works with the individual or family to identify a unit that meets their needs.
- The agency supports the individual or family meet the landlord's screening and eligibility requirements.
- Rental assistance is provided to the landlord to pay the rent for (xx) months, after which the tenant assumes full responsibility for paying rent.
- Supportive services and case management ensure that the household remains stable in housing.

In our area, the Tenant Rental Assistance Program provides rental assistance to individuals and families for use in renting safe, secure, and affordable apartment units. The rental assistance is typically based on the Fair Market Rent (FMR), which in our area is (\$xxx) for a 2-bedroom unit. Providers that receive HUD funding through the (xx) Program can pay above FMR as long as the unit meets rent reasonableness. This provides additional flexibility to find a unit that meets the needs of the individual or family, and provides additional income to the landlord.

Some of the benefits to landlords are:

- **Guaranteed, on-time rent payments.** Both the tenant and the Agency provide rent to the landlord, ensuring consistency in payment of rent. Many agencies in our community use a three-party lease, which means that both the tenant and the Agency are parties on the lease and are responsible for



specific portions of the rent that is due. This provides additional transparency to landlords to ensure that rental payments are paid on-time and in full.

- **Security and damage deposits.** Rental assistance through the Program can make an advance payment of the last month's rent, plus first month's rent and security deposit, to the landlord. The Program also allows for up to one month's rent to be used to cover any property damages, and the agency can provide the landlord with up to one month's rent for a vacancy payment so that the landlord does not need to go through the time and expense of marketing the unit if vacated before the end of the lease.
- **Backing of a partner agency.** Program managers and Agency staff provide direct connections to address concerns and barriers during the tenancy of the individual or family.

Additionally, Tenant Rental Assistance Programs can provide supportive services for up to (xx) months after rental assistance stops to ensure that the household remains stable in their housing and that the landlord's needs are met.

During this time of crisis, finding safe and secure housing for our most vulnerable citizens is of paramount importance. Please consider partnering with our providers to help (city/county/jurisdiction) rebuild.

Sincerely,

(Program Director)



# Sample Program Guidelines

## POST-DISASTER TENANT-BASED RENTAL ASSISTANCE PROGRAM TO ADDRESS HOMELESSNESS

*The following are sample program guidelines for a post-disaster TBRA program that is designed to prevent homelessness in the community. These guidelines are based on an actual CDBG-DR program and, therefore, include reference to a waiver to the three-month limitation on assistance<sup>1</sup> and other specific program components. These guidelines should be adapted to local circumstances, program goals, and funding requirements.*

*Special features in these guidelines, aimed at addressing homelessness, include the provision of housing location assistance and other supportive services to address and/or prevent continuing homelessness, eligibility requirements for people experiencing or at risk of homelessness per HUD's definition of homelessness, and assistance period beyond the 3-month limitation on use of CDBG-DR funds.*

### 1. PROGRAM DESCRIPTION

In response to the loss of affordable housing units due to the disaster, the State developed a program to provide tenant-based rental vouchers. The goal is to increase provision of affordable rental units to [very low, low, and moderate income] households. The program is part of the Supportive Services Program noted in the Action Plan under an activity designed to prevent homelessness among low and very low income residents in counties impacted by the disaster.

### 2. PROGRAM DESIGN

The TBRA Program follows all of the CDBG-DR requirements as well as all State policies.

#### 2.1 PROGRAM ALLOCATION:

*[Insert amount to be allocated for the program]*

#### 2.2 USE OF FUNDS:

Grant funds will provide temporary rental assistance residents of storm-impacted areas (pursuant to Federal Register Notice of allocation) who are experiencing homelessness or are at risk of becoming homeless. Those "at risk" of homelessness are further defined as persons living in unstable or overcrowded housing;

<sup>1</sup> CDBG and CDBG-DR regulations limit the duration of tenant based rental assistance to three months. To extend the program for longer periods, a waiver must be granted by HUD and published in the Federal Register. Some of the guidelines and timeframes in this sample are more reflective of a TBRA program that has received a 12- or 24-month waiver. For 3 month programs, some of the requirements can be reduced and the cohort of available units for 3 month rentals will be more limited.



those forced to move frequently due to economic hardship; and those with increased risk of homelessness as defined by the State’s Consolidated Plan. *[See the [self-certification](#) for suggested eligibility form to be used with Intake Application.]*

2.2.1 TERMS OF ASSISTANCE:

The TBRA voucher will be issued for a term *[insert the timeframe permitted by the program funding source and/or your program design]*.

2.2.2 TENANT RENT:

The household will pay 30 percent of their adjusted income for their portion of the rent, minus the applicable utility allowance. The Program will subsidize the difference between the *Tenant Rent* and the *Unit Rent*. The unit rent may not exceed [X% of HUD’s FMR] for the county where the unit is located.

2.2.3 MAXIMUM ASSISTANCE:

Funding will provide up to *[insert number of months. Keep in mind waiver requirements for CDBG-DR]* months of rental assistance to approximately [## households]. Maximum amount of assistance to a household will not exceed [\$XX].

2.2.4 OCCUPANCY STANDARDS:

The number of bedrooms needed by households of various sizes and composition:

OCCUPANCY STANDARDS	
Bedroom	Household Size
0-bedroom	1
1-bedroom	1-2
2-bedroom	2-4
3-bedroom	4-6
4-bedroom	6-8

Exceptions to these standards may be considered because of the age, sex, health, handicap, relationship of household members or other individual circumstances.

2.2.5 PORTABILITY:

*[Insert language to specify if approved units must be in the disaster area or can be in other areas.]*

2.2.6 SET-ASIDE:

*[Craft language to highlight specific set asides to meet program goals]* This program serves households that are experiencing or are at risk of homelessness. To serve this need, eligible applicants will be [at or below XX% of Area Median income]. To ensure that the most vulnerable are served, the program includes a set aside [for XX households] at or below 30% of the Area Median Income.



## 2.3 TENANT ELIGIBILITY

### 2.3.1 ELIGIBLE HOUSEHOLDS

Eligible households:

- Qualify as homeless or at risk of homelessness [see [self-certification](#)]
- Have income at or below [XX%] of the Area Median Income as established by HUD
- Lived in one of the most impacted counties
- Were impacted by the disaster
- May have previously received rental housing assistance from FEMA and the rental subsidy or rental unit are no longer available
- Sign form certifying that they were displaced, suffered damage, or otherwise experienced financial distress related to housing which was a direct result of the declared disaster

### 2.3.2 UNITS

Tenants receiving TBRA assistance must use the rental assistance in units that are inspected prior to approval. The units must:

- Meet Section 8 Housing Quality Standards and, for units built prior to 1978, are in compliance with HUD's Lead Safe Housing Rule (24 CFR Part 35);
- Rent for a reasonable amount, compared to rents charged for comparable units; and
- Not be receiving another form of rent subsidy

## 2.4 NATIONAL OBJECTIVE:

Low and moderate-income

## 2.5 PROGRAM ELIGIBILITY:

105(a) (8)/570.201(e) - Public Services to prevent homelessness among low income residents; FR 5696-N-01, HUD Waiver FR 5696-N-10, and HUD Waiver FR-5696-N-15.

*(Note: These Federal Register notices provide guidance as to the language necessary to request an extension of the 3-month time limitation on tenant based rental assistance.)*

## 2.6 LINKS TO SOCIAL SERVICES & PERMANENT HOUSING UNITS

To assist households to find permanent housing resources, enable the households to plan for the end of the TBRA period, and link to other needed social services, the program will refer all participants to housing counsellors or case managers as appropriate. Housing counselors and case managers will:



- Provide program participants with housing search assistance. They will use the state or local Housing Resource Center database to prioritize referrals to permanent affordable housing units created with CDBG-DR and other funds.
- Assess the participant's need for other supportive services; including but not limited to employment and job training assistance, behavioral or physical health services, substance abuse treatment services, family counseling, or other services.
- Establish a mutually agreed upon plan to secure and follow through with these services will be determined.
- Meet with the participant on a regular basis during the period of TBRA assistance (suggest at least bi-monthly) to assess the progress toward the goals established in the plan.
- Work with the household to identify a permanent affordable housing unit so that, at the termination of TBRA assistance, the household will not become homeless.

Any applicant who does not receive a voucher will be referred to a housing counseling agency for assistance in locating affordable housing and for other social services referrals.

### 2.7 LEAD AGENCY

*[Insert name of Agency administering the program.]*

### 3. PROCESS

*[It is suggested, although not required, that the Lead Agency implement the TBRA Program consistent with but not identical to its Housing Choice Voucher Program and will follow the policies and procedures that exist within the of jurisdiction's Housing Choice Voucher Program's Administrative Plan.]*

#### 3.1 OUTREACH

*[Insert description of outreach activities to be undertaken. For example:]*

To ensure that eligible participants are made aware of the assistance, the administering agency will conduct outreach to entities that provide programs and services including providers of FEMA emergency services, the local Continuum of Care, and Long-Term Recovery groups. In addition, the agency will provide program information at locations frequented by eligible program participants including, but not limited to, disaster shelters, emergency shelters, social services agencies, schools, medical facilities, and places of worship.

Outreach efforts will provide information regarding access to free housing counseling services in each of the impacted counties. Housing counselors will be available to assist applicants in applying for the program.





### 3.2 APPLICATION PROCESS

*[Will vary based on Grantee's program design.]*

#### 3.2.1 APPLICATION FORM

The application form will be provided in English and *[list other languages appropriate to the area]*. It will be posted on the agency's website and distributed in hard copy at the locations listed above.

Applications will be translated upon request in the event an applicant requires an application in a language other than Spanish. Assistance with the application process will be provided to any applicant upon request.

#### 3.2.2 INTAKE:

*[There are several options to process applications: a lottery is just one]*

Intake forms (electronic or paper) will be accepted from \_\_\_\_\_ (date) to midnight on \_\_\_\_\_ (date). All completed intake forms received by the deadline will be entered into a database and lottery system will be used to randomly select approximately \_\_\_\_\_ (approximate number to be funded) households. After all eligible household are processed, rolling applications will be accepted on a first-come, first-serve basis.

#### 3.2.3 REVIEW OF APPLICATION, CALCULATION OF INCOME:

The program will send letter and application packet in English and Spanish to the applicants selected. For any applicant lacking an address provision will be made for them to come to a local site (municipal office or social services agency) to complete the application. Assistance will be provided at the site to assist them with this process.

Applicants will complete a paper application and return application and any necessary documentation to \_\_\_\_\_ within \_\_\_\_\_ days. Staff reviews the application to determine the household's income eligibility. At the same time staff orders and reviews a criminal background check on the applicant.

An applicant's income eligibility will be verified and documented by staff. The required documentation for eligibility is *[insert documentation requirement. Consider the [self-certification](#) as a model.]*

If the applicant does not remit a completed application package within \_\_\_\_\_ days, the Program Manager sends a letter notifying the applicant that they did not comply with the requirements of the program and the applicant will be given \_\_\_\_\_ business days from the date of the letter to submit additional information and/or clarify any defects in the initial application.



Any applicant that is denied assistance has a right to appeal that decision. Appeals must be received within 15 days of notification that an application has been denied. All appeals received on time will be reviewed by the Administrator of the Housing Assistance Programs and a determination letter will be mailed out within 10 business days.

### 3.2.4 INELIGIBILITY

If an applicant completed the application but did not meet the criteria for the program, they are deemed ineligible. The Program Manager sends a letter to the applicant notifying the applicant that they are ineligible and providing them with an opportunity to file an appeal. The applicant will be given \_\_\_ business days from the date of the letter to file an appeal. All appeals received on time will be reviewed by the Administrator of the Housing Assistance Programs and a determination letter will be mailed out within \_\_\_ days.

### 3.2.5 SELECTION OF APPLICATIONS

Once the application cycle is closed and staff has reviewed all applicants for eligibility, the applicants are contacted and advised of next steps by staff.

*[Add detail regarding what staff will assist and the assistance to be provided such as housing search. e.g., The applicant will be contacted by a case manager, advised of the maximum amount of rental assistance to be provided, and given suggestions of available units. If necessary, the social services case manager assigned to assist the applicant, can provide help in locating a suitable unit.]*

## 3.3 AWARD OF TBRA

### 3.3.1 NOTIFY APPLICANT OF AWARD

The case manager schedules and conducts a briefing with the applicant; the subsidy is determined; and a voucher is issued.

### 3.3.2 CALCULATING THE TENANT SHARE

Staff calculates the tenant portion of rent using the following:

*(Provided as example only. Grantee should specify method for determining tenant's portion of the rent.)*



**Subsidy Calculations:** The calculation of tenant portion of rent is as follows:

(a) Gross Annual Income	(a)
(b1) Deduction of \$480.00 for each minor dependent (under 18 years of age)	(b1)
(b2) Deduction of \$400.00 for a head of household who is 62 and older, or permanently disabled	(b2)
(c) Adjusted Annual Income [calculation: (a) – (b1 +b2)]	(c)
(d) Adjusted Monthly Income [calculation: (c)/12]	(d)
(e) 30% of Adjusted Monthly Income [calculation: (d) * 0.30]	(e)
(f) Tenant paid utility allowance	(f)
(g) Tenant’s share of rent [calculation: (e) – (f)]	(g)

### 3.3.2 UNIT SELECTION

The case manager notifies the applicant of the time they have from the date their application is approved to locate a suitable unit. The applicant (with assistance from the case manager if necessary) locates a unit within prescribed time period and submits a Request for Tenancy Approval to the TBRA staff. Staff contacts the prospective landlord by phone and explains the TBRA program and the payment structure within five business days. If the landlord indicates he will participate in the program staff schedules an inspection, within five business days. (Each funding source has specific inspection standards required.) In the event the applicant has not located a unit within the prescribed time period, they can request an extension of time by contacting the TBRA.

### 3.3.3 INSPECTION OF UNIT IDENTIFIED BY TENANT

To be deemed eligible for the program units must meet the required standards, including the space requirements that meet the regulatory requirement to “provide for the smallest number of bedrooms needed to house a family without overcrowding.”

The inspection staff conducts the Inspection and writes up the results for the file.

Staff must also complete a Lead Based Paint Inspection to verify compliance with the Lead Safe Housing Rule – 24 CFR Part 35 (for units built before 1978 that house children under the age of six).

*(This requirement will apply if the program is extended beyond the 3-month time frame.)*



The Lead-Based Paint Inspection will consist of a visual assessment for deteriorated paint (cracking, scaling, peeling, or chipping paint as well as visible dust, debris, and paint chips). The owner shall stabilize each deteriorated paint surface in accordance with §35.1330(a) and §35.1330(b) before occupancy of a vacant dwelling unit.

If the Unit fails the required inspection standards or inspection for lead, the landlord is provided with a list of deficiencies found and given \_\_\_ days to abate the issue. At the end of \_\_\_ days the landlord contacts the inspection staff to set-up another inspection date. If the issues have been fixed and the unit passes the inspection, the tenant is notified that the unit is approved. If the unit fails – the inspector notifies the landlord and the applicant that the unit is not eligible for the program. The applicant is notified to continue to look for an eligible unit.

#### 3.3.4 APPROVAL OF UNIT

If the Unit passes, a contract with the landlord is executed and sent to the landlord, along with the approved lease (or with any required lease revisions) within \_\_\_ business days. The landlord is required to sign and return the contract within \_\_\_ business days.

The applicant is notified within one business day that the unit qualifies for the program. Staff informs the applicant that they will be notified when the contract with the landlord is executed.

#### 3.3.5 REVIEW OF LEASE

Once the unit passes the inspection, staff reviews the lease within and returns it to the landlord along with the program contract. If staff approves the lease, staff generates a contract and sends it to the landlord with a letter asking the landlord to sign and return the contract, within five business days. If the contract is not received within five business days, staff contacts the landlord to request immediate return of the contract.

When staff receives the signed contract, TBRA Manager signs the contract and the contract is placed in file. The staff notifies the applicant that the contract is signed. No payments can be authorized without a contract signed by the landlord and a fully executed lease.

#### 3.3.6 TENANT MOVES IN

Upon notification of the staff, the applicant contacts the landlord. The landlord must disclose information concerning lead-based paint and/or lead-based paint hazards for housing units built before 1978. This information must be provided to the new tenants before they sign the lease. All prospective tenants will receive a copy of the following documents prior to occupying the unit:



- Lead Hazard Information Pamphlet.
- Lead Disclosure Notice notifying them of any known lead-based paint or hazards in the unit, prior to occupying the unit.
- The applicant signs the lease, moves in, and complies with the lease agreement.

### 3.3.7 TENANT ASSISTANCE SERVICES

*(For certain funding sources, case management services are required)*

All program participants will be provided with social services assistance by Housing Counseling or other appropriate social services agencies. These services may also include:

- Child care services referrals,
- Household budgeting,
- Social services counseling and referral,
- Physical and/or behavioral health services,
- Job training and placement services

### 3.4 FINANCIAL MANAGEMENT

#### 3.4.1 SET UP AWARD INFORMATION IN ELECTRONIC FINANCIAL MANAGEMENT SYSTEM:

The staff inputs all of the required information into \_\_\_\_\_.

#### 3.4.2 AWARD DISBURSEMENTS:

On a monthly basis, landlords will be paid via the check run when the draw is approved - Fiscal staff will draw down the CDBG-DR funds from the U.S. Treasury.

#### 3.4.3 CHANGES IN TENANT OCCUPANCY

*[This text will be adapted based on waivers granted regarding period of assistance]*

At the end of the first lease term of the TBRA voucher, the tenant may be eligible to receive an additional \_\_\_\_\_ months of assistance. Staff notifies the tenant and the landlord \_\_\_ days prior to the end of the lease that the Voucher will expire unless both parties agree to an extension within \_\_\_ business days of the notification and both the tenant and the unit still meet the program's criteria.

The contract rent is agreed to and the contract is amended as needed. The landlord and tenant revise the existing lease or enter into a new lease agreement for the remaining \_\_\_\_\_ months.

### 3.5 REPORTING

#### 3.5.1 MONTHLY RECONCILIATION

Reports will be generated on a monthly basis to track program expenditures.



### 3.5.2 QPR

QPR information will be reported quarterly.

### 3.6 MONITORING

*[Insert description of monitoring plan for the program.]*

### 3.7 RECORD KEEPING

HUD requires quarterly reporting on all CDBG-DR activities and completion of HUD's Quarterly Progress Report (QPR). Staff will report on the activity until it is determined to be complete at which time the need for reporting ends.

### 3.8 CLOSE OUT

Staff must maintain electronic and hard copies of all documents related to the Program for 3 years after the close out of the total CDBG-DR grant award. These records are made available to HUD and the OIG as requested



# Sample Form: Self-Certification of Homelessness or at Risk of Homelessness

*The following can be used as a self-certification form or be adapted to communicate program eligibility requirements. This will not be acceptable in every circumstance, so understanding various program regulatory and statutory requirements will be critical.*

Pursuant to the provisions of the Federal Register Notice a waiver has been granted to extend tenant based rental assistance to households impacted by the disaster who are experiencing or at risk of homelessness. There are many ways in which a household may be determined to be experiencing or at risk of homelessness.

Please indicate below the one (or more) that most closely describes your situation:

- Living in a place not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, on the street.
- In a shelter.
- In transitional or supportive housing.
- In any of the above places, but spending a short time (up to 30 consecutive days) in a hospital or other institution.
- Is being evicted from a private dwelling unit and lacks resource or support network to obtain other housing.
- Is being discharged from an institution such as a mental health or substance abuse treatment facility or jail/prison when the person has been a resident for more than 30 consecutive days and no subsequent housing has been identified.
- Is fleeing domestic violence.
- Has moved because of economic conditions 2 or more times in the past 60 days.
- Is living in the home of another due to economic hardship.
- Is living in a hotel or motel and cost is not being paid by federal, state, or local programs for low-income individuals.
- Lives in an SRO or efficiency apartment where there are more than 2 persons.
- Lives in a larger housing unit where there are more than 1.5 persons per room.
- Is exiting a publically funded institution or system of care.
- Lives in housing that has characteristics associated with instability and an increased risk of homelessness.
- Evidences other circumstances that have a high probability of putting the household at risk of homelessness (provide explanation: \_\_\_\_\_)

Applicant Name (please print):

Applicant Signature:

Date:



# Funding Summary: Resources to Support Tenant Assistance Post-Disaster<sup>2</sup>

Type of Assistance	Funding Source & Federal Agency <sup>3</sup>	Funding Recipient (e.g., administering entity)?	Eligible Uses	Length of Assistance	Potential Barriers or Key Differentiating Factors
Rapid Re-Housing	ESG (Emergency Solutions Grant)  HUD	Metropolitan cities, urban counties, territories, and states	<ul style="list-style-type: none"> <li>Rental Assistance</li> <li>Support Services such as: Housing Search/Placement/ Relocation, Moving Costs, Tenant/Landlord Services (mediation and legal services)</li> <li>Utility Payments</li> <li>Rental Application Fees</li> <li>Security Deposits/First/Last Month Rent</li> </ul>	Short- and medium-term, up to 24 months, including rental arrears up to six months	<ul style="list-style-type: none"> <li>ESG funding requires housing funded under rapid re-housing to meet habitability standards. A <a href="#">checklist for ESG habitability standards</a> is available to support program staff assess housing units.</li> </ul>
Rapid Re-Housing: Tenant-Based Rental Assistance	CoC (Continuum of Care)  HUD	Private nonprofit organizations, states, local government, instrumentalities of state and local government, and PHAs	<ul style="list-style-type: none"> <li>Rental Assistance</li> <li>Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (mediation and legal services)</li> <li>Utility Payments and Deposits</li> <li>Rental Application Fees</li> <li>Security Deposits/First/Last Month Rent</li> </ul>	Short- and medium-term for RRH, plus longer-term for TBRA program	<ul style="list-style-type: none"> <li>Applications for rapid re-housing funds (new or renewal) must be made through the annual CoC program competition.</li> <li>Assistance may be modified post disaster:               <ol style="list-style-type: none"> <li>increased to allow for the most vulnerable households to be served with more subsidies and for a longer period of time or</li> <li>decreased to allow for more households to be served for a shorter period of time.</li> </ol> </li> </ul>

<sup>2</sup> Adopted from USICH guidance on identifying Federal Resources That Can Fund Rapid Re-Housing: [https://www.usich.gov/resources/uploads/asset\\_library/Federal\\_Funding\\_Sources\\_RRH.pdf](https://www.usich.gov/resources/uploads/asset_library/Federal_Funding_Sources_RRH.pdf)

<sup>3</sup> For all programs funded by HUD, check out the [Grantee Page](#) on the HUD Exchange to find contact information, awards, jurisdiction, and other data for organizations that receive HUD funding.





# DISASTER RECOVERY Homelessness Toolkit



## RECOVERY GUIDE

Type of Assistance	Funding Source & Federal Agency <sup>3</sup>	Funding Recipient (e.g., administering entity)?	Eligible Uses	Length of Assistance	Potential Barriers or Key Differentiating Factors
Homeless Prevention and Rapid Re-Housing	SSVF (Supportive Services for Veteran Families)  Veteran Affairs	Private nonprofit organizations and consumer cooperatives who can provide supportive services to eligible populations.	<ul style="list-style-type: none"> <li>Rental Assistance</li> <li>Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (negotiation and legal services)</li> <li>Utility Payments</li> <li>Rental Application Fees</li> <li>Security Deposits/First/Last Month Rent</li> <li>Special Provisions for Persons Fleeing Domestic Violence</li> </ul>	Short- and medium-term	<ul style="list-style-type: none"> <li>SSVF grantees adjust the amount of financial assistance, case management supports, and other services based on a reassessment process and housing stability review to ensure that sufficient assistance is being provided to the Veteran household to ensure housing stability and avoid returns to homelessness.</li> </ul>
Rapid Re-Housing	TANF  Health and Human Services	State/Tribal/Territory TANF office	<ul style="list-style-type: none"> <li>Rental Assistance</li> <li>Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (negotiation and legal services)</li> <li>Utility Payments</li> <li>Rental Application Fees</li> <li>Security Deposits/First/Last Month Rent</li> </ul>	Short- and medium-term, including hotel and motel vouchers	<ul style="list-style-type: none"> <li>Because the use of TANF funds for housing is at the jurisdiction's discretion, states, tribes, and territories have flexibility to coordinate the use of TANF funds with other rapid re-housing funds to either provide higher levels of assistance to families, or to serve a greater number of families in need. For example, TANF could be used to pay for rental assistance while ESG is used to pay for supportive services to help a family remain housed.</li> </ul>
TBRA	HOME Investment Partnership Program  HUD	Metropolitan cities, urban counties, territories, and states	<ul style="list-style-type: none"> <li>Rental Assistance</li> <li>Utility Payments</li> <li>Security Deposits</li> </ul>	Medium- and long-term	<ul style="list-style-type: none"> <li>The cost to administer a HOME TBRA program cannot be charged as a project cost and must be paid out of the jurisdiction's administrative budget and subject to the 10% cap of HOME funds that may be spent on administrative costs.</li> <li>HOME funds cannot be used for non-housing-related activities.</li> </ul>



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## RECOVERY GUIDE

Type of Assistance	Funding Source & Federal Agency <sup>3</sup>	Funding Recipient (e.g., administering entity)?	Eligible Uses	Length of Assistance	Potential Barriers or Key Differentiating Factors
TBRA	CDBG (Community Development Block Grant): CDBG-DR (Community Development Block Grant – Disaster Funds)  HUD	Metropolitan cities, urban counties, territories, and states	<ul style="list-style-type: none"> <li>Rental Assistance</li> <li>Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (negotiation and legal services)</li> <li>Utility Payments</li> <li>Rental Application Fees</li> <li>Security Deposits/First/Last Month Rent</li> </ul>	Short-term	<ul style="list-style-type: none"> <li>Local jurisdictions rarely use CDBG for TBRA and may not be accustomed to using this funding source for this purpose.</li> <li>Must combine multiple eligible activities to ensure the recommended core components of a post-disaster tenant rental assistance program are included.</li> <li>Depending on size of the disaster, CDBG-DR funds may be a community's largest funding source with greatest flexibility: discuss with the HUD representative various waivers that may support increased flexibility, such as length of time assistance may be provided.</li> </ul>
Housing Choice Voucher	HUD-sponsored Tenant Based Voucher NOFA  HUD	Public Housing Authority (Find your local PHA <a href="#">here</a> )	<p>There are several different types of vouchers that a PHA may administer such as Tenant Based Vouchers, HUD-VASH vouchers, Family Unification Vouchers. Each may have different eligible uses. Typically, they include:</p> <ul style="list-style-type: none"> <li>Rental Assistance</li> <li>Utility Payments</li> <li>Support Services when a Voucher program is coupled with Family Self-Sufficiency (FSS) program</li> </ul>	Medium- and Long-term	<ul style="list-style-type: none"> <li>Waiting lists are common for PHA's vouchers. Post disaster, determining allocation of vouchers can prove difficult.</li> <li>PHA's long history in implementing tenant rental assistance programs may prove beneficial in training staff and borrowing systems.</li> </ul>