



**Arlington County
Permanent Supportive Housing
Policies and Procedures**

04/29/2019

Permanent Supportive Housing (PSH) Policies and Procedures

I. INTRODUCTION

Arlington County's Permanent Supportive Housing (PSH) Programs serve a range of individuals and families with critical housing needs. Permanent supportive housing is an evidence-based housing strategy for persons with disabilities and youth who are aging out of the foster care system. Permanent supportive housing refers to integrated, permanent housing linked with flexible community based services that are available to tenants when they need them but are not mandated as a condition of occupancy.

This document contains the policies and procedures of the Permanent Supportive Housing Program. It should be noted that there are some policies and procedures that are specific to the source of funding attached to the rental subsidies. These specific policies are explicitly referenced in this manual.

II PROGRAM OVERVIEW

A. Key Elements of PSH

- 1) Housing is affordable, meaning the tenant household ideally pays no more than 30% of its income toward rent and utilities;
- 2) Tenant households have a lease or sublease identical to non-supportive housing with no limits on length of tenancy, if lease terms and conditions are met;
- 3) Staff proactively engages members of the tenant household in a flexible and comprehensive array of supportive services, without requiring participation in services as a condition of ongoing tenancy;
- 4) Effective coordination with key partners to address issues resulting from medical problems, substance use, or mental health and other crises, with a focus on fostering housing stability and wellness; and
- 5) Supports tenants in connecting with community-based resources and activities, interacting with diverse individuals including those without disabilities, and building strong social support networks
- 6) Before moving into PSH, tenants are asked about their housing preferences. Whenever possible, tenants are offered a reasonable choice of unites that would be similarly available to non-disabled persons.
- 7) Housing is integrated. Tenants interact with neighbors who do not have psychiatric disabilities.
- 8) Leases comply with the Virginia Residential Landlord and Tenant Act and, therefore, do not have any provisions that would not be found in leases held by someone who does not have a psychiatric disability. Leases are renewable at tenants' and owners' option.
- 9) Lease addendums, if any, are like those found in housing for people who do not have psychiatric disabilities and do not restrict visitors or otherwise interfere with a life in the community.

- 10) After paying the calculated tenant rental payment, PSH participants are left with the balance available for discretionary spending sufficient to afford other necessary living expenses.
- 11) The provision of housing and the provision of support services are distinct, based on the tenant's individual needs.
- 12) Support services promote recovery and are designed to help tenants choose, get and keep housing.
- 13) Tenants have choices in the support services that they receive. They are asked about their choices, can choose from a range of services, and different tenants receive different types of services based on their needs and preferences.
- 14) As needs change over time, tenants can receive more intensive or less intensive support services without losing their homes.
- 15) PSH prohibits discrimination because of race, color, sex, national origin, familial status and disability with respect to recruitment and selection for program participation
- 16) PSH provides reasonable accommodations for persons with disabilities.

B. Housing First Principles

The DBHDS program, which is a subset of the Arlington County Permanent Supportive Housing program, adheres to Housing First principle in addition to the key elements listed above. Housing first principles include:

- Admission/tenant screening and selection practices affirm the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment and participation in services.
- Applicants are seldom rejected based on poor credit or financial history, poor or lack of rental history, minor criminal conviction, or behaviors that indicate a lack of "housing readiness"
- Supportive services emphasize engagement and problem-solving over therapeutic goals. Service plans are highly tenant driven without predetermined goals. Participation in services or program compliance is not a condition of permanent supportive housing tenancy.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered a reason for termination
- Tenant selection plan for permanent supportive housing includes a prioritization of eligible tenants based on criteria other than "first com/first serve" such as duration/chronicity of homelessness, vulnerability, or high utilization of crisis services.
- Case managers/service coordinators are trained in an actively employ evidence-based practices for client/tenant engagement such as motivational interviewing and client-centered counseling
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are part of some tenants' lives, where tenants are engaged in non-judgmental communication regarding drug and alcohol use, where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.
- Building and apartment units may include special physical features that accommodate disabilities, reduce harm, and promote health among tenants. These may include elevators, stove-tops with automatic shut offs, wall mounted emergency cords, ADA wheelchair compliant showers, etc.

C. Structure of PSH

PSH forms partnerships with a variety of entities. Listed below are descriptions of the roles and expectations of the various PSH partners.

Housing Services Supports Specialist

- Identify affordable housing options that apartments that meets tenant needs
- Assist participant to apply for an apartment, including negotiating with landlord around issues of credit or criminal history
- Assist participant in applying for rental assistance subsidy
- Along with case manager and landlord, assist with resolving any tenancy issues such as failure to pay rent, noise violations, housekeeping issues
- If necessary, assist with moving participant to another PSH apartment
- Maintaining effective relationships with landlords, property managers, and housing assistance providers
- Providing expertise to tenants and clinical staff in tenant-landlord and fair housing laws, including the use of reasonable accommodations
- Assisting other staff members to develop individualized housing skills training for residents
- *For DHBDS Subsidies:* Assist individuals with developing a housing assessment and plan;
- *For DBHDS Subsidies:* Conducts HQS inspections on rental units

Clinical Case Managers

- Assist with identify and addressing potential barriers to successful tenancy and develop a plan to address barriers
- Conduct regular home visits to assess the condition of apartment, and tenant ability to live independently and abide by the lease
- Provide on-going housing based support
- Work closely tenant landlord to resolve any lease violations.
- Provide landlord with case manager contact information
- Notify PSH staff of any tenancy threatening situations and work with tenant accordingly.
- *For DBHDS Contract:* Behavioral health service providers must hold a triennial license in good standing with DBHDS to provide in-kind community-based behavioral health supportive services. Individuals must be assessed for and have access to treatment, rehabilitative, and supportive services reflective of their changing needs and preferences

Subsidy Administrators

- Processes applications for rental subsidy program.
- Verifies that income and asset and household composition adheres to programmatic administrative regulations
- Determines benefit level eligibility in accordance to established policies and procedures
- Approves or denies rental subsidy application and communicates this information with applicant, in writing
- Maintains client record and file regarding subsidy determination
- Conducts rent reasonableness determination (*state and federal subsidy*)
- Provides information to DHS clients regarding rights and responsibilities
- Accurately tracks payments made to landlords in a timely manner
- Annually recertifies applicant for rental subsidy
- Adjusts rental subsidy amount when client income or household composition changes

PSH Participants

- To be available for home visits conducted by case manager
- Abide by the lease (i.e. pay rent on time, keep apartment clean etc.)
- Report any changes in income or household composition to subsidy administrator (housing grants, Housing Choice Voucher or PSH office)
- Provide proper documentation regarding income, assets and employment to subsidy administrator (Housing Grants, Housing Choice Voucher or PSH office).
- Provide consent for DHS staff to speak with landlord
- Provide consent for DHS staff to speak with individuals listed as emergency contacts

PSH Landlords

- Process apartment application.
- Provide proper maintenance to your apartment.
- Collect rent
- Work with participant and PSH staff to resolve any tenancy issues.

Services and Supports Available to Participant

Below are examples of services and housing related supports that are available to PSH participants:

- Assistance with budgeting and paying rent
- Assistance in applying for apartment and rental assistance subsidy
- Help in meeting lease obligations and complying with apartment rules
- Finding and keeping a job
- Medication monitoring and management
- Assistance with daily living skills such as meal preparation, housekeeping, developing support networks and socialization
- Access to medical and health services
- Counseling and support in achieving self-identified goals
- Conflict-resolution training

III INTAKE AND REFERRAL POLICIES AND PROCEDURES

A. PSH Eligibility Criteria

PSH Locally-Funded Program:

1. Applicants must be Arlington residents. Exceptions can be made for individuals who have been placed outside of Arlington by DHS because there are no residential services available to meet their need. In such instances the individual must have an open, active case with Arlington County DHS.
2. Applicants must be clients of DHS who have mental health, substance abuse, intellectual, developmental or physical disabilities and require supportive housing, or are DHS clients who are leaving foster care and require supportive housing.
3. Priority will be given to applicants who have a critical housing need and who are unable to get or retain housing without ongoing supportive services (see Section V for factors used in determining priority need.)

4. Applicants must have a DHS or contracted case manager/Single Accountable Individual (SAI) and have an open, active treatment plan that effectively addresses the applicant's ability to be successful in housing.
5. The applicant must be willing to comply with the lease and meet the obligations of tenancy, i.e. pay rent and utilities, maintain a safe and healthy living environment, and allow others the peaceful enjoyment of their homes. Support services are not mandated as a condition of occupancy, but SAI's will be required to provide on-going outreach in order to engage residents in services and ensure residential stability.
6. Individuals with a history of serious sexual offenses, pedophilia or arson are not eligible for the program.
7. Individuals who have a pattern of engaging in violent criminal activity or have been being convicted of violent crimes within the past three years are not eligible for the program. (See Section V – item D for more details).
8. Applicant's income must not exceed 40% of area median income at the time of acceptance into the program and subsequent PSH apartment. Once an applicant has secured an apartment, s/he can remain in the apartment until his/her income exceeds 60% of area median income, provided that the subsidy is locally funded. (See section XII for more details).

DBHDS -PSH Program:

Participants of the DBHDS Permanent Supportive Housing project must be individuals with a serious mental illness, including those with co-occurring medical conditions or substance use disorders, as defined by DBHDS who are currently:

1. Patients in state psychiatric facilities who are interested and eligible for PSH, or
2. Residents of supervised residential settings (e.g. ALFs, group homes) who can live independently, or
3. Chronically homeless, or literally homeless and at-risk of becoming chronically homeless, or
4. Unstably housed and frequent users of hospital or criminal justice system interventions and,
5. Household income is no greater than 50% of area median income

DBHDS defines Serious Mental Illness as:

Age: Individual is 18 years of age or older.

Diagnosis: The individual has a major mental disorder diagnosed using the DSM IV. At least one of the following diagnoses must be present. Adjustment disorder or V Code diagnoses do not meet this criterion.

- a. Schizophrenia, all types
- b. Major Affective Disorder
Note: Major Depressive Disorder can be classified as SMI if it is with psychosis, not a single episode and classified as chronic/severe and a recent occurrence.
- c. Paranoid Disorder
- d. Organic Disorder

- e. Other Psychotic Disorder
- f. Personality Disorder
- g. Other mental health disorder that may lead to chronic disability

Level of Disability: There must be evidence of severe and recurrent disability resulting from mental illness. The disability must result in functional limitations in major life activities. The individual must meet at least two of these criteria on a continuing and intermittent basis. The individual:

- a. Is unemployed; employed in a sheltered setting or a supportive work situation; has markedly limited or reduced employment skills; or has a poor employment history.
- b. Requires public financial assistance to remain in the community and may be unable to procure such assistance without help.
- c. Has difficulty establishing or maintaining a personal social support system.
- d. Requires assistance in basic living skills such as personal hygiene, food preparation, or money management.
- e. Exhibits inappropriate behavior that often results in intervention by the mental health or judicial system.

Duration of Illness: The individual's treatment history must meet at least one of these criteria. The individual:

- a) Is expected to require services of an extended duration
- b) Has undergone psychiatric treatment more intensive than outpatient care more than once in his or her lifetime (e.g., crisis response services, alternative home care, partial hospitalization, and inpatient hospitalization).
- c) Has experience an episode of continuous, supportive residential care, other than hospitalization, for a period long enough to have significantly disrupted the normal living situation.

The following are ways in which DBHDS eligibility criteria are verified:

- Serious Mental Illness: Will be verified upon intake and annually by a licensed clinician using the Medicaid definition of serious mental illness
- Patient of a state psychiatric facility - verified by referring entity using the PSH Eligibility Verification Form

- Chronic homeless status: verified by referring entity using the PSH Eligibility Verification Form. Additionally, documentation in shelter can be access through the HMIS system.
- Homeless status – verified by referring entity using the PSH Eligibility Verification Form
- Income eligibility – Income will be verified using third party statements such as Social Security award letter, paystubs and verification of public assistance forms. This will be verified upon intake and annually thereafter.

Youth Aging Out of the Foster Care System

- 1.. Youth who are aging out of the Foster Care System (through the Independent Living Program), or who choose to leave Independent Living Program to pursue employment opportunities can continue to remain eligible for the Permanent Supportive Housing if they meet all of the following criteria:
 - a. Do not meet criteria for any other case management services offered through DHS
 - b. Do not meet the criteria for a traditional Housing Grant subsidy
 - c. Are currently employed and/or enrolled in college or vocational training
 - d. Are meeting the conditions of the lease
 - e. Agree to meet with Supportive Housing Services Manager (or designee) at a minimum of one every two months to discuss housing issues. The Supportive Housing Services Manager will be available to work with individuals on housing issues that may come up in between scheduled appointments.
- 2.. Such youth will continue to be eligible for permanent supportive housing until they become 25, Receive a college degree (undergraduate) or have an income exceeding 60% or area median income, whichever comes first.

B. Referral/Screening Process

1. Applications are completed by the DHS case manager/SAI and sent to the Supportive Housing Services Manager or designee who will forward them to the Permanent Supportive Housing Admissions Team for review.
2. The Permanent Supportive Housing Admission Team includes representatives from across Divisions, and when applicable, representatives of relevant homeless service providers.
3. The Permanent Supportive Housing (PSH) Admissions Team reviews applications and determines if applicants meet the eligibility criteria. The PSH Admissions Team meets once a week. The case manager must attend the meeting. Participation of the applicant is strongly encouraged, but not mandatory. The applicant’s case manager will be notified within 3 days of the admissions meeting.
4. The PSH Admission Team reserves the right to use its discretion when considering an individual for the housing pool who has had any incidents of violent criminal activity within the past 3 years. Mitigating circumstances will be taken into consideration such as – incident was the result of an

untreated disability and now applicant has sought treatment – or the incident was an isolated event.

C. Prioritization

1. Factors Used in Evaluation of Criticality of Housing Need for Placement into Locally Funded Permanent Supportive Housing:

Priority for placement (not listed in priority order) will be given to applicants with a critical housing need as defined by one or more of the following:

- Qualifies as Community Services Board Priority Population as defined by the Commonwealth of Virginia.
- Returning to the community from an institution without appropriate, affordable housing.
- Moving out of residential program without appropriate, affordable housing.
- Current housing environment is no longer appropriate, e.g., living with aging parents, living in substandard housing; etc.
- Homeless (on the street) or residing in a shelter or at risk of homelessness and has serious mental health, substance abuse, or other disability, including physical disability.
- Unnecessarily living or confined in a more restrictive setting than needed.

2. DBHDS Prioritization

The Arlington County PSH program will prioritize DBHDS referrals in the following order:

1. Individuals patients in state psychiatric facilities who are interested and eligible for PSH
2. Individuals who are chronically homeless
3. Individuals who are literally homeless – further prioritized by length of time homeless
4. Unstably housed and frequent users of hospitals or criminal justice system interventions
5. Residents of supervised residential settings who can live more independently

D. DBHDS Verification of Eligibility Criteria

1, Serious Mental Illness: Verification of Serious Mental Illness will be documented by a licensed clinician at program intake and annually thereafter

2, Patient of State Psychiatric Facility: The Participant’s clinical case manager will verify that the individual is a resident of a State Psychiatric facility at the time of intake. This will be documented on the DBHDS Eligibility Verification form

3, Chronic Homelessness: Is defined using the HUD definition of chronic homelessness.. It will also be documented by referring clinician using the DBHDS Eligibility Verification form. Verification of homelessness can also be achieved by third party verification (HMIS, shelter letter etc.) or self-affidavit.

4, Literally Homeless: Is defined by an individual or family who lack a fixed, regular and adequate nighttime residence (see DBHDS Program Operating Manual for further clarification). Verification of this will be documented on the DBHDS Eligibility Verification form. Third party documentation or, if no other documentation exists, self-affidavit are acceptable.

E. PSH Waitlist/ “Pool” Policy

Purpose: To outline the methods in which individuals are placed in the PSH Pool/Waitlist, the ways that PSH staff prioritize selection of individuals for units and the circumstances under which individuals are removed from the PSH Pool.

PSH Pool -Active: Refers to those applicants whose referrals were approved by the PSH Admissions team and are able to apply for an apartment. To apply for an apartment, applicants must possess:

- A valid ID
- Social security card
- For minors in the household, a birth certificate
- Updated income and asset information
- The ability to attend, in person, an appointment to apply for an apartment and ultimately sign a lease (i.e. whereabouts are known, is not currently incarcerated or hospitalized without the ability to obtain a temporary community pass to apply for an apartment)

The active pool is the list that PSH draw from when identifying who to take to apply for an upcoming vacancy. Generally, individuals in the pool will be prioritized for placement based on their housing need.

PSH Pool -Inactive: Refers to individuals whose applications were determined as “active” by the PSH Admissions team but are not able to apply for an apartment as they do not possess the bulleted items mentioned above. Additionally, an individual may have a *temporarily Inactive* status if PSH staff have made reasonable attempts to find an apartment and either the individual is rejecting the apartment(s) offered or their applications are consistently rejected by landlords due to poor credit or criminal history. Individuals in the PSH waitlist will not be prioritized for housing placement.

The PSH Pool will be reviewed and updated at least monthly. Applicants will be placed in either the in active or inactive status. This can change from month to month, depending on individual circumstances. Applicants and/or case managers must keep PSH staff apprised of changes in an applicant’s circumstances that might impact their housing prioritization. A low housing need is not a reason for placing an individual on inactive status.

Removal from PSH Pool/Waitlist: Individuals will be removed from the PSH pool under the following circumstances:

- There is no longer a housing need
- The individual no longer needs housing focused case management
- The individual has moved out of jurisdiction (note- this is not applicable to individuals under the state contract)
- Household income exceeds the limit of PSH subsidy programs
- The individual has been placed in an institution (i.e. jail or hospital) for more than 6 months
- The individual no longer has a DHS case manager.
- The individual needs a higher level of care
- If three (3) attempts have been made to contact an individual and they have not returned calls, emails or attended meetings, they will be placed in inactive status. If they continue to not respond to outreach for a total of 6 months
- In instances where PSH attempts to house individuals with extremely high housing barriers with our most lenient landlords and the applications are repeatedly rejected, PSH reserves the right to remove them from the pool. Decisions will be made on a case-by-case basis.

Individuals who have been removed from the PSH pool/waitlist may re-apply at any time.

IV. PROGRAM ADMINISTRATIVE POLICIES AND PROCEDURES

A. Application and Move-In Process

Once a referral has been accepted, the application is placed in the PSH “pool”, which is the list that PSH draws from when a vacancy occurs. Priority is given to individuals with the highest housing need (individuals exiting out of state hospitals have the highest housing need, followed by individuals who are chronically homeless, followed by individuals who are literally homeless etc.. Individuals who are homeless are processed more quickly than individuals who have some form of housing.

Identification of Apartments: PSH has contracts with a landlords throughout Arlington County for PSH units. Prior to having an individual apply for a unit, the Housing Specialist will identify the specific housing needs and preferences of each applicant and will refer to the list of landlords to see if there are any units available that meet the tenants needs and preferences.. Once an apartment has been identified, the Housing Specialist will contact the applicant and the case manager to start the apartment application process. Whenever possible, the tenant will be offered a reasonable choice of units that would be similarly available to non-disabled persons .

Applying for An Apartment: When an apartment becomes available, the Housing Support Services Specialist will assist the tenant to apply for the apartment. The following documentation will be needed to apply for an apartment:

- Identification
- Check/Money Order for application fee
- Check/Money Order for security deposit
- Income information (award letter from SSI/SSDI, pay stubs etc.)
- Asset information such as several months of checking and savings account statements.

The landlord will do a background check which involves reviewing the applicant’s credit and criminal history. If the applicant’s application is rejected, PSH staff will provide the landlord with accompanying documentation to demonstrate mitigating circumstances behind poor credit and/or criminal history.

If the participant’s application is approved, a dates for lease signing will be scheduled. PSH staff will accompany the individual to the lease signing and apartment inspection. For participants receiving federal or state subsidies, the apartment must pass Housing Quality Standard (HQS), prior to lease signing and annually thereafter.

B. Lease Agreements

1. Participant households should have a lease identical to non-supportive housing leases with no limits on length of tenancy, as long as the lease terms and conditions are met
2. Leases should comply with the Virginia Residential Landlord and Tenant Act and, therefore, shall not have any provisions that would not be found in leases held by someone who does not have a psychiatric disability. Leases are renewable at tenants’ and owners’ option
3. Lease addendums, if any, should be similar to those found in housing for people who do not have disabilities and do not restrict visitors or otherwise interfere with a life in the community.
4. The most current and updated lease documentation should always be in the participant file.

C. Coordination with Property Management

Successful supportive housing is predicated on coordination among housing and supportive services staff, including the SAI, property management, and support services staff (if different than the case manager.)

PSH staff meet with property management staff at least three times a year, or as often as necessary, to monitor progress of DHS residents in meeting lease obligations, including payment of rent, violations of lease rules, behavior jeopardizing the quiet enjoyment and safety of other residents, and/or community activities and resources available to support individual DHS clients.

When appropriate, PSH staff will convene team meetings which will include SAI, as well as property management staff to address individual resident concerns. Information exchange will be open within applicable privacy and confidentiality regulations.

D. Inspections

Arlington County reserves the right to inspect an apartment in order to insure that the landlord is properly maintaining apartments and that utilities are being provided.

Housing Choice Voucher Project Based units: As part of the initial lease-up and on-going recertification process, all households that receive either a Milestones voucher or a PSH Project-Based voucher will be required to have their apartment inspected by Section 8 inspectors. These apartments must meet the federal Housing Quality Standards. Policies and Procedures related to apartment inspections are found in Chapter 8 of the Arlington County Housing Choice Voucher Program Administrative Plan.

DBHDS units: Permanent Supportive Housing program staff will inspect units using HUD Housing Quality Standards. Staff conducting inspections must have the appropriate training to do so. Inspections will be conducted prior to the lease signing and annually thereafter. HQS inspection forms will be documented in the assisted household's file.

E. Extended Leave from Apartment

If an individual in permanent supportive housing will be absent from his/her apartment for an extended time, his/her subsidy may remain intact for up to 90 days for hospitalizations and incarcerations and for 30 days for long distance travel provided that:

- There is an adequate plan for the individual to continue to pay his/her portion of the rent.
- There is an adequate plan for the individual to continue to pay his/her utilities.
- There is an adequate plan for delivery of the individual's mail.
- There is an adequate plan to insure that no other individuals except the lease holder and the landlord will have access to the apartment.
- There is an adequate plan for how landlords will communicate/correspond with the tenant.*
- There is an adequate plan for recertification if it occurs while the individual is away from the apartment.
- The time spent away from the unit is not considered a lease violation or abandonment by the landlord.

The case manager and individual will develop a plan to address the above-mentioned items. The plan will be forwarded to the Supportive Housing Services manager. If the plan is approved, the manager will inform the subsidy administrator to continue the subsidy for up to 90 days. After 90 days, the individual will lose his/her subsidy but can remain in the apartment for as long as s/he abides by the lease and pays

the full portion of his/her rent on time. The subsidy administrator will also notify the individual as to the date of termination of the subsidy.

If the individual will be away from his/her apartment for over 90 days, the case manager will discuss with the individual the option of vacating the apartment so as to avoid an eviction on his/her credit report. For DBHDS clients who are hospitalized or incarcerated for more than 90 days, written approval must be obtained from DBHDS.

Special Circumstances

Repeated Hospitalization: PSH reserves the right to refuse the extended leave request if an individual has repeated hospitalizations. PSH will review these requests on a case by case basis.

Repeated Incarcerations: PSH reserves the right to refuse the extended leave request if an individual has repeated incarcerations. PSH will review these requests on a case by case basis.

Long-Distance Travel: PSH realizes that a significant portion of tenants have family living in another country or state. There may be occasions when a tenant needs to leave the area to see family. Under such circumstances, PSH will continue to pay the subsidy for **up to 30 days**. The tenant must submit proof of departure and return dates. PSH will not adjust the grant amount if income from employment is reduced during the travel period. If the tenant is gone for more than 30 days, the subsidy will be closed and they will be responsible for the full portion of the rent.

Federal Subsidies: Restrictions apply to those subsidies administered by the Housing Choice Voucher program. If an individual is charged with a drug-related crime or violent felony, their subsidy will be immediately revoked.

* In the event that it is not possible to communicate/correspond directly with the tenant, and the individual has no other family or supports to receive such communication, the case manager will serve at the point of contact.

F. PSH Live-In Aide Policy

Tenants are allowed to request live-in aides to assist them with their overall care and well-being. The US Department of Housing and Urban Development (HUD) defined a live-in aide as “A person who resides with one or more elderly persons or near-elderly persons or persons with disabilities who:

1. Is determined to be essential to the care and well-being of the persons;
2. Is not obligated for the support of the persons; and
3. Would not be living in the unit except to provide the necessary supportive services”¹

There is a difference between a person who needs occasional home-based support and a live-in aide. A live-in aide provides assistance overnight as well as during the day.

The Arlington County Permanent Supportive Housing programs live-in aid policy is modeled after the Arlington County Housing Choice Vouchers Live-In Aid policy. PSH tenants whose subsidy is administered by the HCV program will follow the HCV guidelines for live-in aide.

Verification of need of live-in aid for essential care

As the subsidy administrator, the PSH program has a responsibility to verify that the live-in aide is necessary to provide the supportive services that are essential to the care and well being of the individual. The tenant will need to submit documentation to the subsidy administrator from a doctor, healthcare provider or caseworker verifying that a live-in aide is essential to the tenant’s well- being and

¹ 24 CFR part 5.403 as cited in “Live in Aides in Federally-funded Housing Programs: Information for MFP Participants and Program Staff” . Housing Capacity Building Initiative for Community Living. May, 2013

care. Additionally, the tenant will be assessed by the Arlington County Department of Human Services Aging and Disability Division as to whether or not the tenant is in need of a live-in aide. The results of the assessment will not include medical information. In the event that there is a discrepancy between the tenant's healthcare provider and the DHS assessment, the DHS recommendation will be followed.

Who can be a live-in aide?

A live-in aide can come from either an independent agency, or it can be a family member or friend, provided that the family member is not obligated for the support of the tenant. In other words, the individual cannot be financially responsible for the tenant (i.e. spouse, parent etc.).

Typically, when an individual utilizes multiple caregivers on a shift basis, they will not qualify as a live-in aide. This is because the caregivers are not residing in the unit. However, there may be certain circumstances where the rotating caregivers might qualify as live-in aides.

Additionally, individuals who were residing in the unit prior to the request for a live-in aide cannot be considered as a live-in aide.

If the live-in aide is receiving earned income, the subsidy administrator will determine if the hours that the live-in aide works conflicts with providing essential care to the individual.

Income

The income of the live-in aide is not counted for the purposes of calculating the rental subsidy.

Bedroom size

If the household has a live-in aide, then the aide must be included when determining the family unit size. However, the presence of a live-in aide does not automatically mean that an additional bedroom is warranted.

Occupancy

The live-in aid is considered an occupant of the unit and does not have the rights of tenancy. As an occupant, the live-in aide must abide by the rules and regulations of the landlord.

Background Checks

Most landlords will require that a live-in aide will undergo their criminal background check.

G. Moving

Permanent Supportive Housing (PSH) recognizes that over time, individuals may want to move to a different apartment. Moving within PSH is allowable. However, depending on the circumstance, moving to another PSH apartment could take a long time as there are limited number of subsidies and PSH landlords.

Tenants who want to move will be responsible for all costs associated with moving (application fee, security deposit, moving costs etc).* The tenant is also responsible for coordinating the move. The process for identifying an apartment will not begin until a moving plan has been established. The moving agreement will consist of verification of ability to pay for moving costs as well as how the actual move will take place.

In instances where a PSH tenant is being asked to leave due to unresolved tenancy issues, the tenant's case must be reviewed by the PSH admissions team in order to demonstrate that they have an adequate service plan in place to prevent tenancy issues from occurring in the new apartment. PSH tenants who are being asked to leave may need to find alternative housing while they wait for another PSH apartment. PSH does not guarantee that housing can be found before the date of an eviction.

PSH tenants should not move to another apartment without notifying PSH staff.

Process for Moving to another PSH apartment

- Inform PSH staff that tenant wants to move and describe reasons for wanting to move
- PSH tenant demonstrate that they have the means to cover moving costs (see below)
- When a unit comes available, PSH staff will notify tenant and case manager
- Tenant applies for apartment (see below for costs associated with moving)
- Tenant applies for subsidy attached to the apartment
- Tenant must give proper notice to landlord whose apartment is being vacated
- Home visit must be done to old apartment prior to move out
- Tenant moves into new apartment.

Moving Costs (incurred by tenant)

- New application fee (\$37-\$50 per applicant)
- Security Deposit (\$250 - up to one month's rent)
- Damages from old apartment, if any
- If tenants break the lease, they are responsible for the rent on the unit for an assigned amount of time, provided that the unit is vacant.

*In situations where the tenant is at risk of eviction, some programs/resources may be available to assist with moving costs.

H. Apartment Abandonment

Permanent Supportive Housing (PSH) considers an apartment to be abandoned if the tenant has not paid his/her portion of the rent and the case manager has not been able to verify that the individual is living (or intends to be living) in the apartment. If a case manager suspects that the apartment has been abandoned the following steps will be taken:

- Call the landlord to see if s/he has seen or heard from the tenant
- Attempt to conduct a home visit
- Contact emergency numbers listed in file
- File a missing person's report
- Tenant's lease will be reviewed for abandonment clauses

If the above-mentioned steps have been taken and the tenant still has not been located, PSH will consider the apartment to be abandoned. PSH will also consider the apartment to be abandoned the client has been located but has not given a definitive answer as to whether or not s/he intends to reside in the unit. PSH will maintain the subsidy for 30 days after the first missed rental payment (usually the 5th of the month), provided that this timeframe is consistent with any abandonment clauses of the tenant's lease. The tenant will be responsible for the full amount of rent for the timeframe outlined in the lease.

The tenant, the landlord, and any of the tenant's emergency contacts for which consent has been provided, will be notified in writing by PSH that the subsidy will be terminating. The tenant's will be sent through certified mail using a return receipt option to verify that the notification was received. Once the subsidy has been terminated, the tenant will be responsible for paying the full rent amount for the specific time frame outlined in the lease.

I. Program Documentation

1. Releases: PSH staff will ask participants to provide consent for DHS staff to speak with participant's landlord and any other community partners who are involved with assisting the participant adhere to the lease. Releases will be updates on an annual basis.

2. Notice of Privacy Practices: PSH staff will ask participants to sign a Notice of Privacy Practices that informs the participant as to what personal information will be entered the Collaborative Support System

of Arlington (Homeless data management system).

3. *DBHDS Eligibility Verification Form*: This form will be completed as part of the DBHDS intake process. Staff completing the form will have proper credentials for verifying disability and housing status.
4. *Serious Mental Illness Determination Form (DBHDS)*: This form is complete at intake and yearly thereafter by a licensed clinician. This form verifies that the individual has a serious mental illness as defined by Medicaid.
5. *Participant Agreement (DBHDS)*: Participants will sign a participant agreement that advises participants of their rights and responsibilities. This is signed at intake and at recertification. The participant agreement will also include information on the Earned Income Disregard.
6. *Residential Follow-Back Form (DBHDS)*: This is a self-report of a tenant's residential history 6 months prior to obtaining housing
7. *Mini-GPRA (DBHDS)* This data is collected at intake into program and yearly thereafter. Data collected tracks a variety of life domains and whether they have improved since obtaining housing.
8. *Housings Assessment (DBHDS)*: Housing Assessments will be done at intake and before an individual is housed, and annually thereafter. This document will have information regarding the clients current and prior living situations and will identify potential housing barriers.
9. *Housing/Service Plan (DBHDS)*: The Housing Plan will be completed within 30 days of intake into the program. The plan will be reviewed updated at least every six months. Goals will be individualized depending on the needs and interests of the client.
10. *Clinical Service Plans and Case Documentation*: Service plans and clinical information will be maintained in client's record through the service division where they are receiving case management services. PSH staff maintain a separate chart the documenting PSH program eligibility as well as any correspondence that occurs between PSH staff and landlords, case managers etc. on behalf of the tenant. For DBHDS clients, PSH staff will develop annual housing assessments and services plans which are kept in the PSH file.
11. *Case Notes*: PSH staff will document in the PSH record any correspondence they have with the tenant, or the tenant's landlord or other community partner regarding the tenant's housing. Case notes will reflect any progress the client is making towards their goals.
12. *Discharge Summary*: This documents the reason for discharge, events leading up to the discharge, any attempts to prevent the discharge and the individual's destination.

J. Homeless Management Information System(HMIS)

All PSH households will have the following information entered into the HMIS system:

- First name, Last Name, Date of Birth, Social Security, Social Security Data Quality
- All members of the households shall be added to the system as well and will include the above-mentioned data elements.

K. DBHDS Evaluation and Reporting

DBHDS partners with PSH providers to develop a common evaluation framework. Providers will report event-based, client-level data to capture outcomes in the following domains:

- 1) Changes in physical and mental health
- 2) Changes in substance use
- 3) Changes in income and benefits, i.e. Medicaid, SSI/DI, Veterans' benefits, SNAP, and earned income
- 4) Housing stability
- 5) Institutional care utilization before and after the PSH intervention, including psychiatric hospital stays, emergency department utilization, and criminal justice involvement
- 6) Access to primary care and engagement in behavioral health services

The evaluation framework also includes the following process measures:

- 1) Fidelity to evidence-based practices, e.g. the PSH model and *housing first* principles
- 2) Staff trainings and certifications (e.g., PSH training and HQS certification)

Additional Reporting Requirements

- 1) In year 1, quarterly reports to the Office of Adult Community Behavioral Health must include updates on progress toward implementation milestones.
- 2) Monthly reporting to DBHDS of actual PSH expenditures is required.

L. Allowable Costs and Limitations (DBHDS contract)

1. Housing Assistance

- Housing Specialist salary, payroll taxes, and fringe benefits
- Salary, payroll taxes, and fringe benefits for other approved PSH program positions
- Supplies and equipment for housing-related services
- Local travel for housing specialist
- Staff training
- Vehicle purchase or allocation of vehicle costs for PSH program
- Vehicle maintenance and fees
- Extermination costs not covered by landlords' lease obligations
- Property damages
- Rental application fees
- Rental assistance payments to landlords
- Utility deposits (up to \$300 per unit)
- Utility allowances paid to utility vendors as part of rental assistance calculations
- Additional and necessary utility costs beyond what the utility allowance will cover (for zero income participants only).
- Fees for credit and criminal background checks
- Security deposits (up to 1.5 months)
- Vacancy payments to landlords (no more than one month at full FMR)

2. Client Assistance: supports secured on behalf of PSH participants to improve access to and retention in housing and services

- Hotel/motel assistance while awaiting housing (up to two weeks. Longer stays require approval from DBHDS)

- Items to set up households (e.g., bedding, pots & pans, cleaning supplies, etc. Up to \$500 per consumer household)
- Payment of old judgments for rent or utility arrears if necessary to secure housing.
- Fees to obtain IDs and birth certificates
- Storage facility fees
- Fees to obtain IDs and birth certificates
- Emergency food (up to \$75)
- Prescription medication if no other assistance is available
- Furnishings (up to \$1,000 per consumer household)
- Moving fees, equipment and supplies

2. *Administration*

- Staff time for staff supervision, fiscal and grant management, IT and HR support, etc.
- Organizational infrastructure costs (electronic health record, software licenses, office space, phone lines, etc.)

V. SUBSIDY ADMINISTRATION

A. Project Based Rental Assistance Program

The Local Project Based Rental Assistance Program: This rental assistance program is administered through the Housing Grants program. Below is a summary of the existing policies regarding this subsidy.

1. *General Subsidy Requirements*

- Must be referred by PSH and live in a designated project based supportive housing unit
- May not be a recipient of Arlington County Housing Grants or HUD Section 8 program
- Must be Arlington County resident
- Must be legally present in the United States

2. *Application Process:* PSH staff will assist participant to apply for a local project based housing grant subsidy. Applicant must submit asset and income information to the local project based subsidy housing administrator. The applicant will be informed in writing of the verifications required to determine eligibility. The applicant will be informed of the program policy and procedures. Applications must be processed within 60 days of being received by the agency.

3. *Income Requirements:* All sources of income must be verified for an initial determination, recertification and for any reported changes. The countable gross income is the households gross income prior to any deductions or earnings. Both earned and unearned income is counted. Exempt income includes loans/scholarships for educational purposes, foster care payments, income of full-time students, who are not the applicant or the spouse/cohabitant of the applicant.

4. *Calculation of Earned Income:* Earned income to be used in the establishment of the grant and the tenant portion shall be that which best reflects anticipated earnings during the next six months. Generally, earnings received during the month prior to the month of application/review will be used. Income will be converted to an annual amount by multiplying weekly income by 52, bi-weekly income by 26, and semi-monthly income by 24. Income from new employment may be projected based on a statement from the employer. Fluctuating income will be averaged over a period that will establish a reasonable expectation of future earnings.

5. *Changes in Household Circumstance:* Applicants and recipients are required to report any change in income, assets, residence and household members within 10 days. The changes required to report include but are not limited to: source and amount of income, number of hours worked, change in the number of persons in the household. Changes in household income of less than \$100.00 per month will be reflected in the next review or recertification. Changes of \$100.00 or more per months will be reflected as soon as administratively possible, not to exceed two months for the date the change occurred.
6. *Calculation of Rent Payments:* The tenant will pay 30% of their adjusted monthly income towards their rental cases. If the tenant is responsible for utilities, the utility standards will be deducted from the 40% of income and the remainder of the tenant rent. The grant will be the difference between the contract rent and the tenant portion. If there are any non-legally present individuals in the household, the grant will be prorated on the number of household members who meet the legal presence requirement.
7. *Recertification:* All project based supportive housing program cases will be recertified annually. The recertification requires the completion of a new application, verification of income, and resources and other information necessary to establish continued eligibility.
8. *Rental Payments:* Grant payments will be made on the first of each month. Payment will be made to the owner/rental agent.

B. Housing Choice Voucher Project Based at Gates of Ballston

The Housing Choice Voucher Project Based subsidy is administered through the Housing Choice Voucher Program (HCV) of the Housing Assistance Bureau in the Arlington County Department of Human Services. Overall policies regarding subsidy administration can be found in the Arlington County Housing Choice Voucher Administrative Plan.

C. DBHDS Permanent Supportive Housing program

The Department of Behavioral Health and Developmental Services (DBHDS) subsidy is administered through the Permanent Supportive Housing (PSH) program of the Housing Assistance Bureau in the Arlington County Department of Human Services. Below is a summary of the existing policies regarding this subsidy.

1. *Application Process:* All DBHDS assisted households must meet specific criteria and will be screened in partnership with Behavioral Health Care and Permanent Supportive Housing program staff to determine eligibility. All DBHDS applicants must complete a Housing First application to be reviewed by a Permanent Supportive Housing program staff.
2. *Income Requirements:* Permanent Supportive Housing program staff will ensure that the assisted household income is no greater than 50% of area median income in accordance with HUD standards and income limits. Assisted households are not subject to a minimum income requirement. Households with zero income are eligible for assistance through the DBHDS program.
3. *Determination of Annual Income:* Calculation of and verification of annual income will be conducted in a manner consistent with procedures outlined in the HUD Choice Voucher Program Guidebook. If a participant has zero income, documentation is required certifying that the participant has zero income.

- a. *Calculation of Earned Income:* Earned income to be used in the establishment of the grant and the assisted household's portion shall be that which best reflects anticipated earnings during the next six months. Generally, earnings received during the month the prior to the month of the application/annual review will be used. Income will be converted to an annual amount by multiplying weekly income by 52, bi-weekly income by 26 and semi-monthly income by 24. Income from new employment may be projected based on a statement from the employer. Fluctuating income will be averaged over a period that will establish a reasonable expectation of future earnings.
 - b. *Earned Income Disregard:* Assisted households with a disability that receive Social Security Disability Income may be eligible for HUD's Earned Income Disregard. Assisted households must be informed about their potential eligibility for the Earned Income Disregard as an introduction into the program as well as part of their continued service planning. Should an assisted household receiving SSDI obtain employment, a new rental calculation worksheet must be completed documenting the change in income. When calculating the rent, Permanent Supportive Housing program staff will disregard any earned income that exceeds their SSDI benefit amount at a rate of 100% for the first twelve months and at a rate of 50% for the next twelve months in accordance with HUD standards. Earned income and any changes to the earned income must be reported to Permanent Supportive Housing program staff and documented in the assisted household's file. Tenants shall be entitled to and notified of the Earned Income Disregard when the rent is calculated.
4. *Changes in Household Circumstances:* Assisted households are required to report any change in income, assets, residence and household members within 10 days. The changes required to report include but are not limited to: source and amount of income, number of hours worked, and changes in the number of persons in the household. Units to be shared with family members or friends freely chosen by the head of household, will require written permission from DBHDS. The additional household members may count towards the adjusted gross income of the household, thereby decreasing the grant-funded assistance payment for the individuals with SMI. or if the household composition changes.
5. *Utilities:* If utilities are not included in the rental amount, the PSH program should use the standard utility allowance approved by the local housing agency in determining the tenant rent and grant-funded assistance payment. When a DBHDS household is "over-housed," the utility allowance used should be for the number of bedrooms they qualify, rather than the number of bedrooms of the unit that they lease. If the landlord provides for a stove and/or refrigerator then the tenant is not provided an allowance for those items on the utility allowance form. Only when the tenant has to provide their own stove and/or refrigerator are they given credit for these on the utility allowance. When a tenant has zero income – if the utility allowance does not cover all necessary utility costs for a unit, the PSH program may pay those extra costs with DBHDS PSH funds. DBHDS will need to approve the program's continued payment of these costs at each re-certification.
6. *Calculation of Rent Payments:* Rental calculations will be determined using HUD's Rent & Utility Calculation Worksheet. The rental calculation will be completed at least annually as part of the recertification process, but may be calculated more often based on fluctuations in income/benefits outside the annual process. All Rent & Utility Calculation Worksheets will be documented in the assisted household's file along with documentation of benefit or earned income changes. PSH staff will calculate the subsidy payments. Policies and procedures on how to calculate the subsidy can be found in Chapter 8 of the Arlington County Housing Choice Voucher Program Administrative Plan. Calculation of rent is based on the HUD Housing Choice Voucher Guidebook, Chapter 6. PSH programs shall not require a minimum tenant rent contribution. Both the PSH participant and the landlord will have a breakdown in rent explaining who is responsible for what portion of the rent and other deposits. This

breakdown is completed at the time of lease signing and recertification and when there is a change in household income or composition.

7. *Payment Standards (DBHDS)* Under the DBHDS program, units requiring assistance will receive no more than the current HUD Fair Market Rent (FMR) for a one bedroom apartment in the locality or the locally approved payment standard if different than FMR. In Arlington, the locally approved payment standard is 110% of Area Median Income. a rent of up to 110% of area median income. Efficiency units will receive no more than the 0 bedroom FMR.
8. *Rent Reasonableness:* Permanent Supportive Housing program staff will ensure that unit rent is reasonable in relation to rents being charged for comparable unassisted units, in the general area, with similar features and amenities and are not more than rents currently being charged by the same owner for comparable unassisted units. Permanent Supportive Housing staff will determine rent reasonableness by utilizing the Virginia Housing Development Authority's housing search site at www.virginiahousingsearch.com. This site provides comparable data on available units that include; location, rents, unit size, amenities, and utility responsibility. Permanent Supportive Housing staff will compare the unit the tenant will apply for with at least three other similar units. This information about the comparable units will be documented in the assisted household's file. DBHDS rent reasonableness procedures are similar to those found in Chapter 8 of the Arlington County Housing Choice Voucher Program Administrative Plan. Rent Reasonableness should be conducted when a participant is moving into a new unit or the current rent is increasing.
9. *Annual Re-certification:* DBHDS subsidy administrator will re-examine housing income at least annually and make any necessary adjustments to the household rent contribution amount. Documentation from the landlord regarding any increase in rent must be obtained. The DBHDS subsidy administrator will provide a 30 day notice before any increase in tenant portion of the rent goes into effect. Other DBHD documents will be completed during the annual recertification process. This includes but is not limited to: DBHDS application, SMI Determination form, program agreement, and reporting responsibilities form.
10. *Interim Re-certifications :*Interim re-certifications must be conducted at any time throughout the year if the participant loses income, income increases by \$200 or more a month, rent is increased by the landlord or the household composition changes.

If an individual reports a change that will reduce the amount of rent they pay, the change is effective the first of the month following when the written notification was received by the housing specialist. If an individual reports a change that will increase the amount of rent they pay the changes I effective the first of the month following a 30-calendar day notice to the household.

D. Income Review of Locally Funded Subsidy

Once an individual's income exceeds 40% of area median income, his/her case will be reviewed by the Supportive Housing Services Manager to determine the appropriateness of a PSH subsidy. The review will be based on the following factors:

- Income and expenses
- Employment history
- Rental payment history/tenancy issues

An individual's subsidy will be discontinued once an individual's income exceeds the limit allowed by a particular subsidy. Whenever possible, individuals receiving the Milestones or Section 8 project based subsidies (which have an income limit of 40%), will be referred the Local Project Based Rental Assistance program to ensure that they can continue to receive a subsidy until their income exceeds 60%. Acceptance of such a referral to the Local Project Based Rental Assistance program is subject to the availability of such subsidies.

The individual can remain in his/her apartment as long as s/he meets the conditions of the lease.

E. Change in Household Composition

Purpose: This policy clarifies how the Arlington County Permanent Supportive Housing works with tenants when they want to change the composition of their household. Whether an individual can be added to the lease of a PSH tenant is ultimately the decision of the landlord and PSH will defer to the landlord decision. It is a lease violation for any tenant to have other persons residing in the apartment who are not officially on the lease.

3. PSH recommends that the following occur *prior* to a PSH tenant changing the composition of their household:
 - a. The PSH tenant discusses with their clinical case manager any potential clinical issues that might arise as the result of changing their household composition. Examples of potential issues include but are not limited to: resolving conflicts, the nature of the relationship of the person to be added to the lease to the tenant; managing any stress related to the change in household composition.
 - b. Inform PSH staff of their intent to change the household composition of the lease. PSH staff will discuss with them potential housing issues that might arise as the result of this change. Examples of housing issues that might arise include but are not limited to: change in subsidy due to increase/decrease in household income; living costs associated with change in household composition; the ability of all members of the household to adhere to the lease and consequences of not adhering to lease.
 - c. PSH tenant discusses with the landlord the steps needed to add an individual to the lease.
4. For the PSH tenant to successfully add a person to their lease, the following *must* occur:
 - a. The potential tenant must apply to be added to the lease. This usually requires a credit and criminal background check. In most circumstances, the potential tenant is not considered to be under the jurisdiction of permanent supportive housing and therefore will be screened as any member of the public.
 - b. As part of the application process, the potential tenant must provide to the landlord income and asset information.
 - c. PSH tenant must add the potential tenant to the subsidy. This requires providing DHS with income and asset information required to determine the households rent payment.
 - d. If the combined income of the household exceeds the subsidy income limit, the household will no longer be eligible for supportive housing rental subsidy.
 - e. All household members must adhere to subsidy requirements – i.e. reporting changes in income information, provision of required documentation, acceptable results of a criminal background check for federal subsidies.
 - f. If individual tries to add a person to the lease without notifying the subsidy office s/he will jeopardize his/her rental subsidy.

Change in household composition regarding minors: If a PSH tenant wishes to add a minor to the household they must inform the landlord. The landlord will follow their procedures for adding a minor to the household.

Regarding the subsidy, the PSH tenant must provide to the subsidy administrator the name and age of the child, as well as any income or asset that are affiliated with the child.

Exceptions: Specific funding requirements and program guidelines may prevent some households from changing household composition. Also, if the addition of a person to the household places the household income over the PSH limit, the household may need to move depending on whether the unit is a designated unit.

F. Vacancies

1. Local Subsidy: When there is a vacancy, the landlord will make the same or another apartment available to DHS. If the landlord makes the same unit available, and it remains vacant into the next month after the Household vacates, the Owner may receive a Rental Assistance Payment in the amount of 80% of the Contract Rent for a vacancy period of up to sixty days, if the following conditions are met:

- a. The Owner has given Arlington County prompt notice of the vacancy;
- b. The vacancy is not the fault of the Owner; and
 - I. Arlington County does not have a ready Qualified Household to place in the Contract Unit.
- c. When there is a vacancy and the Owner chooses not to make the same unit available, the Owner must notify the County of the next available vacant unit.

2. DBHDS Subsidy: If a unit is vacated before the end of the lease, rental assistance may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless the unit become occupied by another individual eligible for the DBHDS PSH subsidy. In the event that an individual is hospitalized or incarcerated, rental assistance can continue for up to 90 days if there is a reasonable expectation that the individual will return to the unit. Any request for rental assistance beyond the 90 days requires written approval from DBHDS.

XVI. DISCHARGE POLICIES

A. Termination of Subsidy and Discharge from Program

While the goal of the Permanent Supportive Housing (PSH) program is to provide permanent housing opportunities for persons with disabilities, there may be times in which it is appropriate for a person to transition out of the program. It should be noted that if an individual leaves Permanent Supportive Housing, it does not necessarily mean that s/he will lose his or her apartment. The individual can remain in that apartment as long as s/he meets the conditions of the lease and provided that the unit they are in is not specifically designated to the PSH program. The main consequence of not participating in the permanent supportive housing program is that the individual will lose his or her housing subsidy. Therefore, if an individual decides to leave the Permanent Supportive Housing program, it is important that the housing specialist and case manager work with the individuals prior to discharge to develop a plan that addresses payment of rent, as well as any other tenancy issues.

The following are circumstances under which an individual may be discharged from permanent supportive housing:

- 1) Individual no longer wishes to participate in permanent supportive housing
- 2) There is no longer any clinical indication to justify the provision of services (i.e. person is doing well, no longer needs supports)

- 3) Individual's income exceeds the maximum income for Permanent Supportive Housing (40% area median income for the local subsidy, 50% of area median income for DBHDS subsidy)
- 4) Individual does not wish to meet conditions of the lease
- 5) Individual has not engaged in DHS case management services for 90 days and all service and engagement strategies have been exhausted. (Note –applicable only to Locally Funded subsidy) as state subsidies follow a voluntary services model)
- 6) There are serious safety concerns regarding the participant and/or other if the participant remains in a permanent supportive housing apartment

Any time a Case Manager is considering discharging an individual from Permanent Supportive Housing, the Supportive Housing Services Manager must be notified. Individuals cannot be discharged from Permanent Supportive Housing without approval from the Supportive Housing Services Manager.

1. Termination of DBHDS Subsidy

- a. PSH will take into consideration extenuating circumstances leading up to the violation to insure that participants are only terminated due to safety concerns for participant and/or others.
- b. PSH staff will provide the participant with written notice of termination and the reason for termination. Events leading up to termination should be clearly documented in either the clinical file of the PSH file.
- c. If termination of rental assistance is due to violation of rules pertaining to subsidy administration (i.e. failure to renew paperwork, failure to report income changes etc.), the subsidy administrator will issue notification of termination of rental subsidy. In these instances, the termination process will mirror the rules and regulations and appeals process established by the Housing Choice Voucher program.
- d. Termination policies and procedures for DBHD subsidy will mirror that of the Arlington County HCV program and can be found in section 7. B of the Arlington County HCV Standard Operating Procedures.
- e. It should be noted that termination of a subsidy does not necessarily mean termination from the program. Every effort should be made to re-house an individual.
- f. If a participant is discharged from the program, a current household member, if also eligible, can be approved for the program, provided that there is DBHDS written approval in the file.
- g. When rental assistance is terminated, the last payment will follow the calendar months in which notice was given to the landlord regard the termination of assistance, unless the unit is occupied by another PSH tenant.

2. Termination of Local Project Based Rental Assistance Subsidy: Assistance for a qualified household will terminate when one of the following situations exists for a household:

- a. The household moves from the unit
- b. Rental assistance may be terminated if a participant violates conditions of occupancy
- c. The household no longer meets all eligibility requirements
- d. The household fails to provide information required for a case recertification
- e. Program funding is terminated
- f. The household fails to apply for a recertification
- g. Services manager terminates services. The household may remain in the unit if it is agreeable to the landlord, however the landlord will try and offer another unit for this program.
- h. When rental assistance is terminated, the last payment will follow the calendar months in which notice was given to the landlord regard the termination of assistance, unless the unit is occupied by another PSH tenant.

B. Graduation

A person may be asked to transition out of PSH into a Housing Grant if s/he meets the following criteria:

- Meets criteria for Housing Grant program
- Has continuously maintained housing for the 3 years or longer
- Clinical need for home visits is less than once per quarter
- Household is in good standing with landlord over the past 12 month (i.e. no 21/30 warning letters issued to tenant)
- Current income is above the average income of a housing grants recipient
- Rent for apartment does not exceed the rental ceiling for Housing Grants.

Process

- Tenants will be notified of the PSH graduation criteria (see above) prior to moving into a PSH apt. Individuals who are already in PSH will be notified in writing of the new policy.
- On a quarterly basis, PSH staff will review tenant updates to see if there are any individuals who meet the transition criteria.
- Upon identifying an individual who meets the PSH graduation criteria, PSH staff will consult with tenant's case manager to confirm that the tenant does meet graduation criteria.
- Individual will be notified that they will be graduating from PSH. Individual has the option of either graduating in place or moving to another apartment.
- As an incentive, tenants will receive a \$200.00 gift card to be used towards food and/or apartment costs.
- PSH staff will inform Housing Grants that a PSH tenant will be graduating to Housing Grants.

C. Appeals

1. Local and State Subsidies

A Permanent Supportive Housing (PSH) participant or applicant may appeal an agency decision within 30 days of notification by contacting, in writing, the Supportive Housing Services Manager for certification issues related to services, PSH program eligibility and/or subsidy administration.

The appeal will be scheduled within 10 business days of receipt by a panel. The composition of the panel will depend upon the content of the appeal:

Appeal related to subsidy administration (i.e. rent calculation, termination of subsidy etc.): Housing Assistance Bureau Chief (or designee) and the manager of the subsidy program in dispute

Appeal related to discharge from PSH: Housing Assistance Bureau Chief (or designee) and a Supervisor from the service division where the individual receives services

Appeal related to housing supports provided in the PSH program: Housing Assistance Bureau Chief and a supervisor from the service division where the individual receives clinical services

Regardless of the type of the appeal, the individual will be invited to present either verbally or in writing, his/her reasons for wanting an appeal. The individual is permitted to bring community support members, provided they inform the panel ahead of the meeting. The PSH staff responsible for making the decision related to the appeal will also be allowed to present information to the panel as to how they arrived at their decision. A designee of the panel will notify the participant/applicant in writing of the decision on the appeal and the reasons for denying or approving the appeal. This will occur within 7 business days. This decision is final.

2. Federal Subsidies:

Appeals process regarding subsidy administration or termination of subsidy will follow the appeals process of the Arlington County Housing Choice Voucher program. Procedures for this are listed in the Arlington County Housing Choice Voucher Program Administrative Plan

