

Homeless System Response: Emergency Housing Vouchers Funding Briefs: CoC Rapid Rehousing (RRH)

Purpose

The Emergency Housing Voucher (EHV) program (see [Notice PIH 2021-15](#) for details) is a new housing voucher program, funded by the American Rescue Plan (ARP), that provides 70,000 housing vouchers through Public Housing Authorities (PHAs) to assist people who are experiencing or at risk of experiencing homelessness; are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless. Implementation of EHV must be done in partnership with the Continuum of Care (CoC) and Victim Services Providers (VSPs). CoCs are encouraged to offer or make connections to supportive services for households referred to the PHA for EHV. The purpose of the *EHV Funding Briefs Series* is to provide information on funding that can be utilized to provide services and resources to eligible EHV households.

This brief will focus on considerations for pairing CoC-funded rapid rehousing (RRH) services with EHV and avoiding duplication of services. Communities should consider joint enrollment in EHV and RRH programs as a strategy to support households who will benefit from time-limited supportive services. This resource pairing may also be utilized for households already enrolled in RRH with ongoing financial needs that will need to transition from RRH to an EHV in order to maintain long-term housing stability.

Eligibility

In order to pair EHV with CoC-funded RRH services, households must be:

- Prioritized and eligible for EHV (see [Notice PIH 2021-15](#)).
- Prioritized (by coordinated entry) and eligible for CoC RRH, meaning the household must enter the CoC RRH program before or while they lease a unit with the EHV.

Emergency Housing Vouchers Eligible Populations (per PIH Notice 2021-15)	Eligible for CoC RRH? (for details, see: Homeless Eligibility Overview)
<p>a. Homeless under one of the following categories:</p> <ol style="list-style-type: none"> 1. Literally Homeless 2. Imminent Risk of Homelessness 3. Homeless Under Other Federal Statutes 4. Fleeing/Attempting to Flee Domestic Violence 	<p>Generally, yes, though specific eligibility will depend upon the Notice of Funding Availability (NOFA) under which the RRH project was funded. In recent years, households in Categories 1, 2, and 4 have been eligible for RRH.</p>
<p>b. At Risk of Homelessness, under one of the following:</p> <ol style="list-style-type: none"> 1. An individual or family who: <ul style="list-style-type: none"> • Has an income below 30% of Area Median Income (AMI). • Does not have sufficient resources or support networks to prevent homelessness. • Meets one of a set of criteria indicating housing instability. 2. A child or youth who qualifies as homeless under other federal statutes. 3. A child or youth that qualifies as “homeless” under Section 725(2) of the McKinney-Vento Homeless Assistance Act and the parent(s) or guardians if living with them. 	<p>No.</p>
<p>c. Individuals or families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.</p>	<p>Yes, for households that meet the Category 4 definition of homelessness, which means they have no other residence and lack the resources or support networks to obtain other permanent housing.</p>

Emergency Housing Vouchers Eligible Populations (per PIH Notice 2021-15)	Eligible for CoC RRH? (for details, see: Homeless Eligibility Overview)
d. Individuals or families who are recently homeless, as determined by the CoC, including participants in rapid rehousing and permanent supportive housing.	Not at entry. Current RRH tenants that bridge to an EHV for rental assistance can keep services for up to six months after RRH rental assistance ends while they are eligible.

CoC Rapid Rehousing

Rental Assistance

Per 24 CFR 578.51, CoC funds may be used for the following costs (only when rental assistance is not already being funded by the EHV program):

Services	Allowable Costs
Rental Assistance	Tenant-based short-term rental assistance (up to 3 months) and medium-term rental assistance (4–24 months). Note: Supportive services may be provided until 6 months after rental assistance stops. EHV and RRH rental assistance may <u>not</u> be utilized together.
Financial Assistance	Up to 4 months of rent (security deposit equal to no more than 2 months’ rent, first and last month’s rent) and property damage; last month’s rent may be paid only if necessary to obtain housing for a program participant and not already funded by the EHV program.
Rental and Utility Arrears*	Up to 6 months of rental arrears and 6 months of utility arrears to remove barriers to obtaining housing quickly and help reduce the spread and harm of COVID-19.

*Allowable per the [HUD CPD Memo: Availability of Additional Waivers for CPD Grant Programs to Prevent the Spread of COVID-10 and Mitigate Economic Impacts](#). The use of waivers requires recipients of CoC funds to notify HUD and are limited to specific timelines.

Supportive Services

CoC funds can cover a wide range of supportive services to help program participants obtain and maintain housing. Some of these services overlap with the services that can be provided using the EHV services fee, so CoCs and PHAs should carefully consider how best to strategically use each program’s resources and clearly document distinct activities and costs that will be covered by each source with adequate procedures to prevent duplication of benefits. Per 24 CFR 578.53, supportive services that can be provided include:

- Annual assessment of service needs
- Assistance with moving costs
- Case management
- Childcare
- Education services
- Employment assistance and job training
- Food
- Housing search and counseling services
- Legal services
- Life skills training
- Mental health services
- Outpatient health services
- Outreach services
- Substance abuse treatment services
- Transportation
- Utility deposits
- Direct provision of services

Key Considerations

- CoCs and PHAs should recognize the potential for EHV to address [housing inequities driven by systemic racism](#) and work closely with people of color, Indigenous people, people with lived experience of homelessness, and other key stakeholders in developing their [strategy for prioritizing EHV and related resources](#) and [updating Coordinated Entry processes, including prioritization, to advance racial equity](#).
- CoCs and PHAs should consider how funding can best be used to reduce barriers to housing for people from historically marginalized populations including people of color, Indigenous people, LGBTQ+ individuals, and people with disabilities.

- CoC funds used must provide *different* types of assistance than that being provided to a participant by any other public sources. Since many of the allowable activities and costs under Rental Assistance and Supportive Services for CoC are also eligible costs for the EHV Services Fee, CoCs and PHAs should carefully consider how best to strategically use each program’s resources and clearly document distinct activities and costs that will be covered by each source with adequate procedures to prevent duplication of benefits.

Specific Considerations for Using CoC RRH Resources

- The CoC program interim rule does not proscribe the length of time a program participant may receive supportive services in an RRH project when the rental assistance is paid for by non-CoC funds; however, HUD recommends that projects combining RRH services, paid for by CoC funds, and EHVS establish standards in line with the time-limited nature of RRH projects, which are designed to serve households for no longer than 24 months.
- To retain CoC services funded under the RRH component, program participants must also meet eligibility criteria at re-evaluation (conducted no less than once annually) to determine if the program participant lacks sufficient resources and support networks necessary to retain housing without CoC assistance and the types and amounts of assistance that the program participant needs to retain housing.
- Supportive services provided under the RRH component of the CoC program should adhere to [Housing First principles](#), and recipients are not allowed to require program participants to take part in disability-related services. CoC RRH projects must require the program participant to meet with an RRH case manager no less than once per month, as set forth in § 578.37(a)(1)(ii)(F), to assist the program participant in maintaining long-term housing stability, but this requirement is waived through September 30, 2021.*

*Available waivers are outlined in the most recent [HUD CPD Memo: Availability of Additional Waivers for CPD Grant Programs to Prevent the Spread of COVID-10 and Mitigate Economic Impacts](#). The use of waivers requires recipients of CoC funds to notify HUD and are limited to specific timelines. See the Memos, Waivers, and Grant Amendments section on the HUDEXchange [Disease Risks and Homelessness page](#) for the most current list of available waivers.