

Disaster Voucher Program (DVP) Supplemental Guidance: Rental Assistance for Special Needs Families Displaced by Hurricanes Katrina and Rita

Background

On February 3, 2006, HUD issued PIH 2006-12, Disaster Voucher Program (DVP) Operating Requirements – Rental Assistance for HUD-Assisted Families and Special Needs Families Displaced by Hurricanes Katrina and Rita. This notice provides supplemental DVP guidance for pre-disaster homeless families and families assisted by HUD Special Needs programs who were displaced by Hurricanes Katrina or Rita.

Most DVP program requirements apply to a Special Needs family. The same DVP housing assistance payments contract and tenancy addendum are used for both categories of families. The monthly housing assistance payment is calculated in the same manner, and the same owner responsibilities, and maximum term of assistance apply to all DVP families. The Special Needs family must comply with the family obligations of the DVP program. Supplemental DVP requirements that only apply to the Special Needs families are explained below in this supplemental guidance.

HUD will provide special administrative fees to cover the costs of additional PHA responsibilities for Special Needs families and to facilitate contracting for services from the designated Special Needs Administering Agency (SNAA), formerly known as the KDHAP-SN Administering Agency (KAA), in each Continuum of Care jurisdiction, or other service providers.

Definitions

A “family”, for purposes of the DVP, is defined as a person or group of persons, as determined by the PHA, approved to reside in a unit with assistance under the voucher program. See 24 CFR 982.4.

A “Special Needs family”, for purposes of this supplemental guidance, is defined as a family that resided in an emergency shelter, transitional housing or housing assisted through a Special Needs housing program (Supportive Housing Program (SHP), Shelter Plus Care (S+C), or Housing Opportunities for Persons with AIDS (HOPWA)); or was sleeping on the streets or in other places not meant for human habitation in one of the federally declared disaster areas between August 21 - 28, 2005 (for Hurricane Katrina) or September 16 - 23, 2005 (for Hurricane Rita).

Eligibility Determination and Verification for Special Needs Families

Sections 4.b, 4.c, 4.g, and Appendix 2 of Notice PIH 2006-12 are applicable to the Special Needs families. The Special Needs family must have evacuated from a Hurricane Katrina federally-declared disaster area within Louisiana, Mississippi or Alabama or a Hurricane Rita federally-declared disaster area within Louisiana or Texas. In the case of

families that were not homeless, the family's residence must have been destroyed or is uninhabitable or lacks essential services, as determined by HUD or a HUD-designated entity. The homeless population eligible for DVP assistance is families who were already homeless before Hurricanes Katrina or Rita, not families who lost their homes as a result of either of the disasters. Further, the homeless population eligible for DVP assistance does not include families who were "doubled-up" and living with friends, family members, or other individuals before Hurricanes Katrina or Rita.

HUD does not have the computerized records necessary to identify the pre-disaster housing occupied by Special Needs families and to automatically add these families to the Disaster Information System database. Therefore, it is necessary for a separate verification process to ascertain the eligibility status of Special Needs families.

Eligibility verification for Special Needs families includes the determination that the family resided in one of the federally declared disaster areas between August 21 - 28, 2005 (for Hurricane Katrina) or September 16 - 23, 2005 (for Hurricane Rita) in an emergency shelter, transitional housing or housing assisted through a HUD Special Needs housing program, or was sleeping on the streets or in other places not meant for human habitation.

This eligibility verification consists of interviewing the family and completing a record of intake; collecting family information; researching the family's pre-disaster housing circumstances; contacting the pre-disaster housing provider or any other entity that can verify that the family was homeless in the alleged location; and obtaining residency eligibility documentation.

Before a Special Needs Family can receive assistance, the PHA must receive (1) written or oral verification of the family's pre-disaster housing residency from the HUD Special Needs SHP, S+C, or HOPWA housing provider, or (2) a certification by a Continuum of Care organization in the disaster area that the family was homeless based on information contained in electronic or paper records, or personal statements made by homeless providers/social services staff who assisted the homeless family immediately prior to the hurricane.

Attachment 1, Sample Record of Intake, and Attachment 2, Sample Special Needs Eligibility Verification/Certification, are provided to assist the PHA and the PHA's contractors to verify Special Needs family eligibility for the DVP. These forms are not required for the DVP, but instead are provided as sample forms that PHA may opt to use after modification to include Hurricane Rita evacuees and delete references to FEMA registration numbers.

After it is determined that the family is eligible based on the criteria above, the PHA must further screen the family concerning non-citizenship status, and record or history of violent or drug-related or other criminal conduct, alcohol abuse, sex offender registration law status, or similar matters. Prior to receiving DVP assistance, all Special Needs families must be screened by the PHA in accordance with section 4.g and Appendix 2 of

Notice PIH 2006-12. As a result of the mandatory and any optional PHA screening, the PHA may be authorized or required to deny DVP assistance to the family or discontinue such assistance.

Housing Search and Lease-Up Assistance for Special Needs Families

It is also anticipated that Special Needs families will require extensive housing search and lease-up assistance. Housing search and lease-up assistance consists of identifying available, appropriate housing units; transportation of the family to view available units; setting up appointments with owners to view units; discussions with owners concerning the housing stabilization and case management services that will be provided to the Special Needs family; assisting the family in negotiating the lease with the owner; transportation of the family to the PHA for completion of DVP paperwork; and at the discretion of the PHA, payment of all or a portion of any security deposits required by the owner and other pre-leasing expenses of the family. In providing housing search assistance to a family that includes a person with disabilities, the special needs of the family must be taken into consideration.

Housing Stabilization and Case Management During the Lease Term for Special Needs Families

It is also anticipated that the Special Needs families will require extensive housing stabilization and case management services during the DVP lease term. Housing stabilization consists of family follow-up meetings and home visits; assessment and identification of the family's special needs and development of a plan for meeting these special needs; referrals for services and transportation to service providers as needed; arrangement for on-site service delivery; intervention with the owner (if necessary) concerning lease and tenancy issues; and establishment of a long term housing plan in preparation for the end of the DVP assistance. During the time the household is receiving DVP assistance, bi-monthly face-to-face meeting is recommended along with recurring and regular telephone contact. The purpose of these meetings and other contacts is to (1) maintain communications with the family; (2) verify that the family is still in the unit and still needs DVP assistance; (3) determine whether the family is meeting the lease and DVP obligations, and any case management family recommendations; (4) keep informed about the family's plans with respect to continued participation in the DVP or their interest in returning to the family's home area; and (5) communicate any DVP information from the PHA.

The PHA or the contractor may also monitor whether the family is complying with any case management recommendations that will assist the family in meeting the family's lease and DVP family obligations. Examples of case management recommendations include taking prescribed medications and keeping medical and counseling appointments.

PHA Contracts for Special Needs Supplemental Services

HUD recognizes that determining whether Special Needs families meet the DVP eligibility criteria is problematic and that these families will need intensive housing search and lease-up assistance, and continual housing stabilization and case management services in connection with their DVP assistance. Therefore, HUD strongly recommends that DVP PHAs contract with the SNAA or another experienced Continuum of Care provider. Alternately, if the PHA has experience in this area, the PHA may opt to provide these services directly or may contract with another qualified entity experienced in providing services to Special Needs families.

Attachment 3 to this DVP supplemental guidance is a List of Special Needs Administering Agencies (SNAAs) Willing to Perform DVP-Related Functions. These agencies have been identified by the Continuum of Care providers as willing and able to screen and assess the Special Needs families and provide housing search and housing stabilization services.

An important case management resource for families displaced by Hurricane Katrina is the Katrina Aid Today initiative. Ten social service and voluntary organizations will oversee 3,000 professional staff and volunteers who will assist 100,000 families displaced by Hurricane Katrina to rebuild their lives. Trained by the United Methodist Committee on Relief, the staff and volunteers will help survivors identify sources of support, develop personal recovery plans, acquire access to services and take appropriate actions to bring them to self-sufficiency. It is anticipated that the Katrina Aid Today Case Management Consortium will be fully operational in March 2006. Additional information concerning Katrina Aid Today can be found at www.katrinaaidtoday.org. Contact information for local area consortium members is posted on this website under "contact us".

The Katrina Aid Today case management services will be provided using donated funds and volunteers at no cost to the family or the PHA. Thus, if such services are available in the location where the Special Needs family is residing, the PHA is required to arrange for the use of the Katrina Aid Today case management services and must stop paying for case management services by an alternate provider or PHA staff. Any contracts for case management services should have a termination clause that would permit the PHA to terminate the case management portion of the contract accordingly.

Special Administrative Fees.

In recognition of the added difficulties in verifying eligibility, leasing units, and providing case management services for Special Needs families, HUD will provide supplemental administrative fees for each Special Needs family assisted under the DVP. These supplemental administrative fees are as follows:

If the PHA subcontracts with the SNAA, an experienced Continuum of Care service provider, or another experienced provider for Special Needs eligibility determinations and verifications, housing search and lease-up assistance, and housing stabilization and case management services, the PHA will receive:

- \$500 one-time PHA fee for initial placement and contract management for each Special Needs family. (This amount is in lieu of the \$1,500 one-time initial placement fee for non-Special Needs DVP families.)
- Up to \$3,900 for contract services for each Special Needs family. The \$3,900 fee was calculated by HUD based on the following:
 - \$200 one-time fee for family eligibility determination and verification of the pre-disaster housing circumstances;
 - \$1,000 one-time fee for extensive housing search and lease-up assistance; and
 - \$150 per month, up until the time that Katrina Aid Today case management services are available for the family but in no event to exceed \$2,700 per family, for housing stabilization and case management services.

If the PHA does not subcontract for these services and instead elects to perform Special Needs eligibility determinations and verifications, housing search and lease-up assistance, and housing stabilization and case management services in-house:

- The PHA will not receive an initial placement and contract management fee for each Special Needs family (neither the \$500 one-time fee mentioned above or the \$1,500 one-time initial placement fee for non-Special Needs DVP families).
- The PHA will receive up to \$3,900 for each Special Needs family. The \$3,900 fee was calculated by HUD based on the following:
 - \$200 one-time fee for family eligibility determination and verification of the pre-disaster housing circumstances;
 - \$1,000 one-time fee for extensive housing search and lease-up assistance; and
 - \$150 per month, up until the time that Katrina Aid Today case management services are available for the family but in no event to exceed \$2,700 per family, for housing stabilization and case management services.

These special administrative fees are one-time fees per Special Needs family and will only be paid if a DVP lease and HAP contract are executed on behalf of the Special Needs family. However, if the PHA is experiencing funding shortfalls because the PHA paid the SNAA for family eligibility verifications for a large number of Special Needs families who were determined ineligible for the DVP, the PHA can contact the HUD HQ Housing Voucher Management and Operations Division at (202) 708-0477 to discuss the need for additional administrative fees.

Regardless of whether the PHA contracts for services for Special Needs families, the PHA will receive an ongoing administrative fee equal to 10 percent of the actual DVP housing assistance payment for every month the Special Needs family is under lease with DVP assistance.

Record Keeping and Program Close-Out

The PHA administers a single DVP program, regardless of whether some participants are Special Needs families. This means the PHA maintains one set of records for the DVP program and does not maintain a separate set of records for Special Needs families. Likewise, there is a single final audit and cost certification for the PHA's entire DVP program at the conclusion of the program.

Attachments

Attachment 1: Sample Record of Intake

Attachment 2: Sample Special Needs Eligibility Verification/Certification

Attachment 3: List of Special Needs Administering Agencies (SNAAs) Willing to Perform DVP-Related Functions