



# Getting your Tribal HUD-VASH Infrastructure in Place

# Training Team

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# Training Overview

## Veterans Affairs

- Hiring Plan
- Connecting with Grantees
- Webinar Update
- Regional Trainings

## HUD

- Admin Fee & RAP
- Leasing Up
- Considerations under TBRA & PBRA
- Leases & Contracts
- Policy Development
- Reporting & Recordkeeping
- FAQ's

# Federal Collaboration

## HUD

- Provides the Housing Assistance
- Access to Housing
- Policy Direction
- Supports Tribes/TDHE's

## VA

- Addresses the Needs of Veterans
- Case Management
- Access to Veterans Benefits
- Supports Veterans



# Tribal Housing and Urban Development- Veterans Affairs Supportive Housing (Tribal HUD-VASH) Program VA Case Management

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# Tribal HUD-VASH

- Two parts to both HUD-VASH programs
  - Housing assistance from HUD Office of Native American Programs (ONAP)
  - Case management and supportive services from VA
- Case management and supportive services are a requirement of the program

# Case Manager Role

The case manager determines admission

- Outreach
- Assessment
- Advocacy
- Assistance with housing process
- Referrals
- Coordination of care
- Provides care for Mental Health and Substance Use Disorders
- Helps Veterans build skills

# CASE MANAGEMENT

- Integral to success of Tribal HUD-VASH
- Clinical credentials – Prefer Master’s level, independently licensed social worker or registered nurse because of the complexity
- Program Veterans have multiple complicated physical and mental health diagnoses
- Follows evidence based and “best practice” models, *especially Housing First*
- Case management provides long term assistance and support
- Case management continues until it is no longer needed - mutual decision



# Evidence Based Practices

- Tribal HUD-VASH, like the standard program, will utilize evidence based practices
- These are models with data showing performance effectiveness
- The models used in the program were developed to help homeless individuals
- They have been in practice for many years
- The HUD-VASH practices provide low barrier access for individuals who could not manage high demand programs

# Evidence Based Practices

- Housing First, Critical Time Intervention and Harm Reduction are used in HUD-VASH
- Do not require sobriety or treatment for participation
- Ensure the right amount of engagement depending on the Veteran's functioning
- Help Veterans evaluate behaviors, outcomes and options so they can make informed choices

# Health Care and Support Services

- The case manager will provide a lot of services, but won't be able to provide everything.
- Health care – coordination with local health providers – VA can be utilized as needed
- Mental Health care – some can be provided by the case manager, but medication will need to be prescribed by a medical provider
- Non-Veteran services – Family, spouse, child assistance

# Marketing

- Town Halls
- Meeting with individuals and groups who might know who the Veterans in need are
- Flyers
- Veterans Service Organizations
- Tribal leadership
- Word of mouth
- All about developing connections

# Stand Down

- Stand Down is a military term
- Annual event used for many years with homeless Veterans
- Provides one location for multiple services and resources
- Some tribes have been holding Stand Downs in recent years
- Good opportunity to talk about Tribal HUD-VASH and find candidates

# Identifying Participants

- “No Wrong Door” Approach
- Widespread awareness of program
- Referrals
- Outreach to places where homeless Veterans might be
- Collaboration with tribal communities and agencies, especially Veteran’s organizations
- Serve based on highest need, not “first come first served”
- Assessment – does the Veteran meet criteria?

# Admission

- Veteran is found
  - Referral to case manager
    - Self-referral
    - Tribe referral
    - Other referral/Outreach
- Case manager does the assessment
- Case manager enters the Veteran into VA data systems
- Case manager determines eligibility criteria is met
- Case manager determines admission

# Tribal HUD-VASH PROCESS

- Following Admission into Tribal HUD-VASH, the case manager
  - Assists with services and getting documentation
  - Refers Veteran to tribe/Tribally Designated Housing Entity (TDHE) for subsidy
- Tribe/TDHE determines eligibility and offers Veteran rental assistance
- VA and TDHE help Veteran locate and obtain housing
- VA provides clinical services to sustain the Veteran in housing



# Case Manager Status

- 26 total participating tribes
- 8 contracting
- 18 VA hires
  - Identifying tribal members who meet credentialing requirements
  - Some tribes are invited to participate on the interviewing panel
  - Most tribes have at least one potential candidate

# Duty Station

- Determining where the case manager will be located
  - many tribes do not have a VA facility/Community Based Outpatient Clinic
- Some tribes have already established office space for the case manager
  - If VA employee, should have logistics taken care of
  - If contracted, tribe will have to provide computer, cell phone or other communication device, car, etc.

# Credentialing

- All case managers will have to go through VA credentialing to access the Computerized Patient Record System (CPRS) and Homeless Operations, Management and Evaluation System (HOMES)
  - Process will go faster when can get documents turned in quickly
    - Degree
    - Licensure
- All case managers will have to pass a background check

# Orientation and Training

- All case managers will need to be oriented to:
  - Veterans Health Administration and local VA sites
  - Veterans Benefits Administration
  - VA Policies and Procedures
  - Homeless Services
  - HUD-VASH
- Additional training in HUD-VASH models and concepts is on-going with opportunities throughout each month

# Working Together

- Need to develop processes
  - What are the steps?
  - Who does what?
  - What documentation happens and when?
  - How do you know when someone is ready to move to the next step?
- Communication, communication, communication – how often will you meet?
  - Reviewing status
  - Who is in/out of the program?

# Data

- Demonstration pilot – need data to show impact
- Data is key to resources
  - Homeless Count
  - Outcomes
- VA has HOMES to evaluate the program
- HUD has own data processes
- Need to reconcile these two data sets on a regular basis to make sure that they always match up

# Community Resources

- Collaborate with local resources
- Unless housing is furnished, will need to obtain furniture, dishes, linens, soap, broom, etc.
- Will there be a security deposit?
  - Some places have set up a fund that participants pay into – then if one of them damages a unit, they can use the fund to help pay for them.
- Rehousing

# Communication

- Once the case manager is oriented and trained, s/he will become the primary point of contact for Tribal HUD-VASH
- Set mutual goals “Ending Veteran homelessness”
- Regular reviews on progress
- Performance Improvement meetings to make the process smoother, easier, fewer delays or barriers
- Open communication to resolve problems and concerns
- The current Point of Contact will continue to be involved as needed



# Questions?

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# **Administering Tribal HUD-VASH**

Tom Carney & Iris Friday

# Division of Duties – Pre-housing Phase

A Tribe/TDHE may NOT provide rental assistance under this program unless it receives a referral from the VA and the referred Native American veteran meets the eligibility criteria for housing assistance

## Veterans Affairs

### Case Manager Duties

- First Point of Contact for Veteran
- Determination of Homeless/At Risk of Homelessness
- Eligibility for VA Health Benefits
- Honorable Discharge Status
- Determination of Case management services
- Working with Tribe/TDHE on the handoff
- Identification of Potential unit

## Tribe/TDHE

### Staff Duties

- VA Notifies Tribe/TDHE of Veteran Referral
- Income & Native Status Eligibility
- Sex Offender Registry Review
- Create Veteran Files
- Notify VA on Final Eligibility determination
- Contract/Leases
- Property Inspections
- 50058 Reporting

# **Admin Fee & Rental Assistance Payments**

# What is the Administrative Fee?

- \$85 per unit per month; \$1,020 per unit/year
- For example, 20 units = \$20,400
- The Administrative fee is included in the overall grant award amount, but is a separate budget line item (1606-Administrative Fee) within LOCCS:
- HUD encourages the use of unutilized Administrative Fees for rental assistance payments to serve more veterans.

# When can you use the Admin fee?

- Tribes/TDHEs can access the Administrative Fee once the implementation plan and IHP amendments are found in compliance by HUD.
- These costs include start-up expenditures, as well as ongoing Admin expenses.
- Administrative Fee drawdowns are subject to the Treasury 3-day rule.

# What are the eligible uses for the Administrative Fee?

- Primarily Salary and Fringe Benefits of THVASH staff
- Examples of Activities (but not limited to):
  - Eligibility determinations
  - Owner Outreach Efforts
  - Unit Inspections
  - Annual & Interim Re-examinations
  - Tenant Fraud Investigations and Hearings
  - Costs Associated with Making Rental Assistance Payments
  - Complying with Reporting Requirements

Cannot use THVASH administrative fees for the Tribes/TDHE's IHBG program

# When can you access funds for rental assistance payments?

- Once the implementation plan and IHP amendments are found in compliance by HUD.
- RAP funds cannot be accessed until:
  1. VA refers Veteran
  2. Tribe/TDHE determines eligibility
  3. Veteran locates unit
  4. Unit passes inspection
  5. Lease and RAP contract is signed with copies on file at the Tribe/TDHE
- RAP funds will be drawn down from LOCCS, under the separate budget line item: (1640 - Rental Assistance Payments)
- on a monthly basis thereafter.



# Leasing Up

# What are the various types of rental units under TBRA?

## 1) Privately-owned units

- Local Market
- Independent Landlord

## 2) Tribally-owned units

- BIA HIP
- Independent from TDHE

## 3) TDHE-owned units

- NAHASDA Assisted Units
- LIHTC
- Other Units in Inventory (except FCAS)

1937 Act Units are not eligible units for THVASH.

# What are Project Based Rental Assistance (PBRA) units?

- Units owned by the Tribe, TDHE or other type of owner.
  - Units planned or under construction
  - Units to be rehabilitated
  - LIHTC
  - Existing Units/apartment complexes
- Rental Assistance is tied to the unit or units

# What are the unique requirements under PBRA?

- PBRA must be approved by HUD.
- The PBRA requirements are listed in the Implementation Notice.
- Environmental review required before entering into a RAP contract or lease for project based units.
- Binding Commitments required to ensure affordability for 15 years, regardless of ownership.

# **Considerations under TBRA & PBRA**

# Who determines where the veteran lives?

- The Veteran determines where they want to live based on the available housing stock.
- The Veteran has the right to refuse a TDHE unit and either wait for another TDHE unit or look for a market rate unit.
- Bedroom sizes must be determined in accordance with the Tribes/TDHE's policies.

## ***Other housing unit considerations:***

- Access to Supportive Services and Case Manager
- Within Indian Service Area

# What is the housing search term?

- Tenant-based rental assistance must have an initial term for housing search of at least 120 days.
- Project-based rental assistance must be offered in the form of the next available project unit.

# How are rents determined?

- Tribes/TDHEs may determine rents by bedroom size based on:
  - Local Fair Market Rents (FMR)
  - Housing market conditions
  - Unit Operating Costs
- Tribes/TDHEs should have a written policy on how rent is determined for THVASH on file.



# What are the rent considerations?

- Rents may not exceed 110% of local FMR.
- If Tribe/TDHE deems it necessary to exceed 110% of local FMR, HUD approval is required.
- Considerations: Establishing rents less than 110% of FMR allows Tribes/TDHE's to house additional eligible Veterans.

# How do we address utilities?

- Utilities can be included in the rent amount.
- If utilities are not included in rent, RAP funds **cannot** be used to directly pay utilities.
- However, IHBG funds can be used to assist the veteran in paying utilities.

# What are grounds for denial?

- The tribe/TDHE can find a Veteran ineligible for the program based on:
  - Over Income status
  - Doesn't meet determination of "Indian"
  - Is found on the Tier III sex offender registry
  - Does not meet the Tribe/TDHE's tribal preference policy.
- There may be other options of assistance besides THVASH; connect with Case Manager

# How do I document a denial?

- For denials, document the reason for denial and provide for an informal review.
- Maintain a copy of the denial notice in the Veteran's housing file **and** notify the Case Manager.

# **LEASES AND CONTRACTS**

# Leases v. Contracts

- Leases – Outlines the relationship between the tenant and the landlord.
- Contracts – Outline the relationship between Tribe/TDHE and the landlord
- There will be a separate Guidance published on RAP Contract Requirements

# What types of Agreements are Required?

## 1) Privately-owned Unit:

- Rental Assistance Payment (RAP) contracts between Tribe/TDHE and private landlord
- Lease between Veteran and private landlord

## 2) Tribally-owned units (not TDHE):

- Lease between Veteran and Tribe
- No RAP Contract Required

## 3) NAHASDA Units:

- Lease between Veteran and Tribe/TDHE
- No RAP Contract Required

# Are standard lease formats required?

- 1) Tribe/TDHE may be able to utilize their current lease/contract documents, supplemented by an THVASH addendum, or,
- 2) Create a THVASH unique lease/contract
- 3) Required lease/contract components will be addressed in a separate guidance and sample documents should also be available shortly



# **Policy Development**

# What Policies have to be in Place Before the first Veteran Referral?

- Sex Offender
- Tribal Preference (optional)
- Occupancy Policy Addressing THVASH: Income determination, Recertification, and Rent determination

# Sex Offender Policy (Required)

- Include written standards that prohibit admission if the veteran or any member of the household is subject to lifetime sex offender registration (Tier III offense).
- Tribes must perform background checks to make this determination.
- The background check must be for the state where the housing is located **and** any state where the veteran or household members are known to have resided.

# Sex Offender Policy

- NOTE: If a household member other than the Veteran is subject to lifetime registration, the Veteran must agree to removing the sex offender from its household composition before rental assistance is offered.

# When Policies Conflict

- The Federal Register Notice prevails when there is a conflict between any provisions of NAHASDA.

# **Reporting and Record Keeping**

# Reporting

## IHP Treatment

- For FY16: In order to drawdown current funds grantees must have an approved IHP amendment
- For Future FY's include as standard activity

# Reporting

- APR – Reporting Outputs on Veterans Served
  - Report on actual veterans served and housed
  - Should tie with data from 50058 Report
- 425's – Required Quarterly, same schedule as IHBG



# Managing Veteran Files

- Maintain records of referrals, eligibility or denial determination.
- Create a physical file. Maintain copies of pertinent information.
- Include verification of Sex Offender background checks
- Any changes to income or household composition must be kept in the veteran's file and transmitted via the 50058.

# 50058 Reporting

Nick Zolkowski

# 50058 Reporting Tool

Based off of HUD 50058 MTW form

- Will be a desktop application (Microsoft Access database) that tribes will fill information into
- Will complete during:
  - 1) initial signups
  - 2) annual re-examinations/interim re-examinations
  - 3) changes in payment or units, or household composition
  - 4) withdrawal from program

# Reporting Tool

- Type of information that will be collected:
  - Personal information on the veteran and family members in the unit
  - Location of the unit (address)
  - Information about the unit (# of bedrooms, type of unit, etc.)
  - Tenant's expected monthly contribution towards rent (only final number needed; is not calculated in the tool)

# Reporting Tool

The screenshot displays a software application window titled 'Tribal Family Report'. The interface includes a menu bar with options like 'File', 'Home', 'Create', 'External Data', and 'Database Tools'. Below the menu is a ribbon with various icons for actions such as 'Cut', 'Copy', 'Paste', 'Filter', 'Sort & Filter', 'Refresh All', 'Save', 'Delete', 'Records', 'Find', 'Go To', and 'Text Formatting'. The main area contains a form with the following fields:

Household/Veteran Name	ABCASD*****P ABCS*****ADF	Family Mailing Street Address	ABC"A
Household/Veteran Social Security #	999-11-1111	Family Mailing Apartment Number	123'23"PP
TDHE Number	29	Family Mailing City	TEST
TDHE Name	AVCP Regional Housing Authority	Family Mailing State	AK
Program Code	Project Based Voucher	Family Mailing Zip Code	12323
Type of Action	New Admission	Number of bedrooms in unit	1
Effective Date of Action:	1/1/2016	Building Structure Type	Single family detached
Admission to Program Date:	1/20/2016	Owner/Agent Name	TST
Projected Re-exam Date	1/20/2017	Owner/Agent TIN/SSN	123,12
Special Program Code	Tribal HUD VASH	Rental Assistance Payment (RAP)	\$120.00
Homeless At Admission Indicator	Yes	Ownership Of Unit	Other Federal Subsidized
Unit Street Address	ABC"A	Contract Rent to Owner Amount:	\$230.00
Unit Apartment Number	123'23"PP	Total HAP	\$110.00
Unit City	TESTTEST'S		
Unit State	AK		
Unit Zip Code	12323		
Mailing Address Same As Above:	No		

# Reporting Tool

The screenshot displays a software interface with a ribbon menu at the top containing 'File', 'Home', 'Create', 'External Data', and 'Database Tools'. The ribbon includes various icons for actions like Cut, Copy, Paste, Filter, Sort & Filter, Refresh All, New, Save, Delete, Find, and Replace. A status bar at the top right shows the IP address '10.200.36.72'. Below the ribbon, there are several tabs: 'Tribal 50058 MAIN MENU', 'Tribal50058', 'Tribal50058PB', and 'qryTribalScreen2SubForm'. The main area contains a data table with the following content:

Per	Last Name	First Name	MI	Date of Birth	Sex	Relationship Code:	Disability Code:
1	ABCS''''''''ADF	ABCASD''''''''P	D			C	0
2	A'S'A"	AP''L'	D	1/20/2016	F	C	0

To the right of the table are four buttons: 'Add Member', 'Save', 'Delete', and 'Close'. Below the table is a form with the following fields:

- Last Name:
- First Name:
- Middle Initial:
- Date of Birth:
- Gender Code:
- Relationship Code:
- Disability Code:
- Race Code:
- Ethnicity Code:
- Social Security #:
- CDIB #:
- VeteranID:

A vertical 'Pane' label is visible on the left side of the form area.

# Reporting Tool

- Tribe will fill out information, save as a file, and send the file to HUD as an email attachment
- Will have direct upload capabilities developed in the near future
- Instructions with screen shots will be sent with tool on how to fill out form and submit

# **Frequently Asked Questions**



**Is a veteran required to participate in case management in order to receive the housing assistance?**

*Yes. Case Management is a core component of the Tribal HUD-VASH program.*

# **Are only Native veterans eligible for Tribal HUD-VASH?**

*Yes. The Tribal HUD-VASH program is modeled after the key components of NAHASDA.*

# Does the rental assistance continue even after completing the case management component?

*Yes. A veteran can no longer be in need of a case management and the rental assistance will continue.*

*However, the tribe/TDHE may choose to subsidize the veterans rent and reallocate the HUD VASH rental assistance to another veteran that needs case management.*

**Is the tribe/TDHE responsible for damage done to a privately-owned unit?**

*No. The rental lease is between the landlord and the veteran/tenant.*

*The veteran/tenant is responsible for the unit.*

# If the veteran gets evicted/damages a unit, are they expelled from the Tribal HUD VASH program?

*Not necessarily. HUD has not established any alternative requirements for termination of assistance for Tribal HUD–VASH participants.*

*However, prior to terminating **THVASH** participants, HUD strongly encourages tribes/TDHEs to work with the VA case manager and consider all relevant circumstances of the specific case prior to determining whether to terminate assistance.*

# **If a veteran damages a unit or gets evicted from a TDHE unit, is the tribe/TDHE required to help locate a new unit?**

*Yes. If the tribe/TDHE decides to not house the veteran in another TDHE unit, the veteran may pursue private market units.*

*If the veteran is unable to find another unit, then the veteran must forgo their HUD VASH assistance and the tribe/TDHE can help a different Native veteran.*

*Follow the guidelines for termination that were provided in the Federal Register notice.*

# **Are veterans housed if they have substance use or alcohol issues? What if there is a tribal policy against alcohol/substances?**

*Yes. Veterans with substance/alcohol abuse issues will be receiving supportive services as part of their case management.*

*The Tribal HUD-VASH program requires any substance/alcohol abuse policy that bars or hinders a veteran from being housed be waived for purposes of THVASH.*

# Am I limited to just my formula area?

- *No. The Federal Register Notice specifies Indian Area – this can exceed your formula area for purposes of THVASH.*
- *Indian Area is defined as “the area within which an Indian tribe/TDHE operates affordable housing programs.”*



# Can you convert from TBRA to PBRA?

*Yes, but the change to PBRA must be approved by HUD and meet the requirements listed in the Notice.*

## ***Sample conversion scenarios:***

- 1. Convert unutilized TBRA to PBRA*
- 2. Offer an available PBRA unit to a Veteran currently using TBRA.*
- 3. Or, if a Veteran with TBRA no longer needs case management, the THVASH assistance can be replaced with IHBG. The THVASH assistance can then be applied to the available project-based unit to assist another eligible Veteran.*

## **If using TBRA, who picks what unit gets used: the veteran or the tribe/TDHE?**

*The veteran. The tribe/TDHE may offer the veteran a unit, but the veteran has the right to refuse the unit and either look for a privately owned unit or wait for another tribally owned unit to become available.*

# Can a veteran be housed with a Tribal HUD VASH voucher in a unit that was built with subsidized funding?

*Depends. NAHASDA does not have an operating subsidy specific to units constructed by NAHASDA funding. The subsidy is tied to construction. Therefore, a NAHASDA unit can have an operating subsidy in the form of Tribal HUD VASH rental assistance.*

*However, Tribal HUD VASH rental assistance CANNOT be used on FCAS units.*

**Can Tribal HUD-VASH be used outside of the United States (e.g. Canada or Mexico)?**

*No. The same rules of IHBG apply here.*

**Is there a proximity requirement (e.g. veterans must live within a certain area/ distance from the VA)?**

*There is not a set distance of “too far away.” VA leaves the determination up to the discretion of the case managers as to what they feel are reasonable distances to travel to provide case management services (so it will vary based on geography, climate, etc.).*

## **Can the tribe screen for felonies other than lifetime sex offender registration?**

- *No, the tribe can only screen for, and deny assistance to an otherwise eligible veteran based on sex offender status. It cannot deny assistance based on any other felony or criminal activity.*

# RESOURCES

- Tribal HUD-VASH [GUIDEBOOK](#)
- [FAQ's](#)
- [Federal](#) Register Notice “Implementing the Tribal HUD – Veterans Affairs Supportive Housing program
- [NEW WEBPAGE DEDICATED TO THVASH](#)

# VA Contact

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Updates on [www.hud.gov/codetalk](http://www.hud.gov/codetalk)

**Thank You! We'll keep you  
posted on future updates.**

Please take the survey following this  
presentation.