

## Task Force Recommendations and Program Enhancements Unified Document for Review

Last Updated 12/13/19

The DHS Family Rehousing Stabilization Program (FRSP) Task Force developed two program models and suggested many program enhancements to FRSP. DHS staff added a new program concept for consideration to meet the specific needs of career pathway where the timeline for attainment of skills and prerequisites for goal attainment exceeds the FRSP rental assistance time frame.

This document presents the unified recommendations as well as the comments gathered from Task Force Members at the Third Task Force Meeting and additional comments received via email after the last Task Force meeting as outlined below:

- A. Bridge Model
- B. TANF Model
- C. Additional options for enhanced housing stability

### Program Enhancements/Improvements

- A. Administrative
- B. Assessment
- C. Data and evaluation
- D. Housing and financial assistance
- E. Program services and offerings

At the end of each section, DHS provided clarifying information and responded for the questions asked and documented general statements as they are.

DHS provided clarifying information and recommendation on the proposed model based on the feasibility study conducted. In occasions where the recommendation was deemed not feasible, DHS provided alternative approaches that are believed to meet similar intended outcomes for the Task Force's consideration.

At the upcoming Task Force meeting, an integrated set of draft recommendations will be presented that addresses Task Force process inputs and aligns with the DHS staff feasibility review. During the meeting, the Task Force will review and discuss the integrated draft document to consider which recommendations will be forwarded as part of the Task Force recommendations.

## FRSP Bridge Model

### **Task Force Recommendation:**

The Bridge Model is contemplated for families who have a pathway to a TAH or PSH voucher. These are families with children who are deemed eligible for homeless services at VWFRC; who are currently in shelter or in the first three months of FRSP [to ensure early determination for long term housing subsidy]; and who meet the eligibility criteria listed below. However, families who meet the eligibility criteria anytime during their time in FRSP program can also transition to the Bridge Model. While eligibility is determined with the criteria listed below, voucher assignment prioritization will be based on first-in, first-out basis. The TAH or PSH case manager will assist the family with completing the voucher application if it has not already been completed while in shelter.

TAH Eligibility	PSH Eligibility																								
A household member has a documented chronic illness that impacts the head of household's ability to reach full earning potential.	Chronically homeless (documented 1 + years) or experienced homelessness repeatedly (more than twice)																								
Families must provide information demonstrating that their disability prevents them from working and/or engaging with TEP.	Families must provide information demonstrating that their disability prevents them from working and/or engaging with TEP.																								
The household must include at least one adult (18+ years old) and one minor or dependent child.	Have a chronic mental and/or physical health diagnosis and unable to appropriately utilize and follow-up on diagnosis (i.e. medical appointments);																								
The family must be connected and engaged to community resources that are assisting the family to remain compliant with program rules and stably housed.	Inability to follow through with basic program requirements (i.e. completion of a service plan, paying bills, making it to required appointments); Lack of ability/interest to manage income/funds;																								
Income guidelines: <table><tr><th>Income</th><th>Household Size</th></tr><tr><td>\$42,250 or below</td><td>6</td></tr><tr><td>\$39,350 or below</td><td>5</td></tr><tr><td>\$36,400 or below</td><td>4</td></tr><tr><td>\$32,800 or below</td><td>3</td></tr><tr><td>\$29,150 or below</td><td>2</td></tr></table>	Income	Household Size	\$42,250 or below	6	\$39,350 or below	5	\$36,400 or below	4	\$32,800 or below	3	\$29,150 or below	2	This family may receive SSI or SSDI and be limited in their ability to engage in work activities to increase their income. <table><tr><th>Income</th><th>Household Size</th></tr><tr><td>\$42,250 or below</td><td>6</td></tr><tr><td>\$39,350 or below</td><td>5</td></tr><tr><td>\$36,400 or below</td><td>4</td></tr><tr><td>\$32,800 or below</td><td>3</td></tr><tr><td>\$29,150 or below</td><td>2</td></tr></table>	Income	Household Size	\$42,250 or below	6	\$39,350 or below	5	\$36,400 or below	4	\$32,800 or below	3	\$29,150 or below	2
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**Program length:** Families can expect to be in the Bridge model until transferred to TAH/PSH with the following two conditions:

- Families will sign a 12-month FRSP lease. If they receive the voucher before the 12-month lease is over, families lease in place within 60 to 90 days or find an appropriate unit based on the size of the voucher within the time limit.
- Landlords will be informed in advance that families may get a voucher before the 12-month lease is over.

**Case Management:**

TAH Case Management	PSH Case Management
Case management services will be provided DHS TAH case managers	Case management services will be provided by DHS contracted PSH service providers
Case management and rental assistance	Intensive case management and rental assistance
Monthly contacts	Two face-to-face and two non-face-to-face contacts per month.
The case management ratio for this group would be 1: 50 <sup>1</sup>	The case management ratio for this group would be 1:17

**Housing:** The Bridge Model is a pathway to a voucher. Each family will sign a one-year lease upon entering into the program and will receive program services administered by TAH or PSH case managers with a FRSP subsidy until the voucher is utilized. Upon receiving the voucher, families lease in place within 60 to 90 days or find an appropriate unit based on the size of the voucher within the time limit. When one-year lease ends, the family can decide to either move to a new unit using the TAH/PSH voucher or stay in the current unit.

**Services:** Housing case management services will be focused towards housing stabilization and connection to health care and other services to support the head of the household and all household members. If DHS is able to adjust the caseloads<sup>1</sup> to be lower during the initial phase, families in TAH will receive a Critical Time Intervention case management to provide intensive assistance in the early stages of the program.

**Housing Case Management Services:**

- Assistance and support with lease up
- Tenant Landlord support
- Ensuring timely submission of rental payments
- Ensuring timely remediation of maintenance and unit issues

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<sup>1</sup> Based on the current DHS capacity, the realistic case management ratio for families receiving TAH is 1:50. Consistent with the work of the ICH/Medicaid workgroup, DHS is further assessing the possibility of a tiered TAH & PSH case management based on level of service need.

- Connections to needed community resources and supports

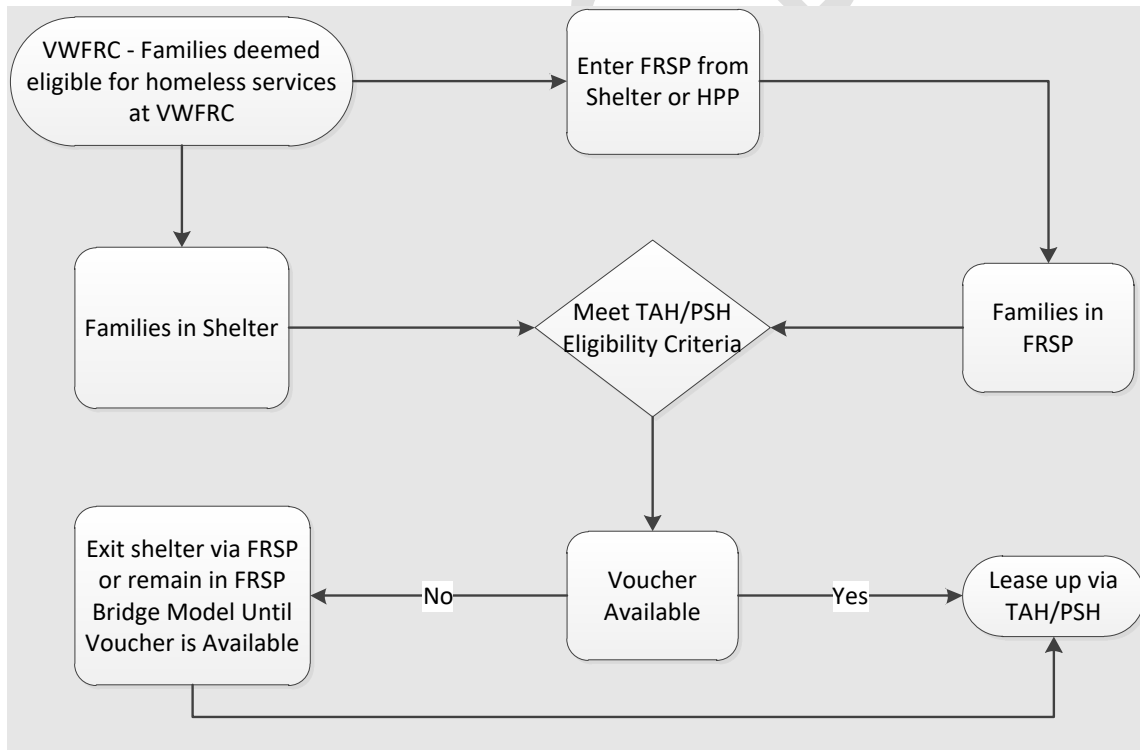
**Landlord Management (completed by the housing case manager):**

- Consistent communication with landlords to establish clear expectation about the option to lease in place when the family gets the voucher.
- Provide landlords updates on the status of the family's voucher application
- Discussion and communication regarding required documents in order to lease in place

**Exits:**

- Families lease in place within 60 to 90 days or find an appropriate unit based on the size of the voucher within the time limit. FRSP rental subsidy will remain in place until that time.
- If the family is deemed eligible for TAH/PSH while in FRSP TANF Model, the FRSP case manager completes warm handoff to PSH/TAH case manager within 15 days of notice of eligibility.
- The TAH/PSH case manager will assist in unit identification and lease up process for the new voucher.

**Referral Process:**



**Task Force Comments on the Bridge Model:**

#### Clarifying information from DHS:

- There are caseload differences between TAH and PSH.
  - The caseload in PSH is 1:17, and TAH caseload is 1:50.
- Families will pay 30% of their income towards rent while enrolled in the Bridge Model.
- Both TAH and PSH include utility allowance as housing cost. Families can only qualify for the utility allowance once they are approved for a voucher. Hence, families in FRSP Bridge model are encouraged to lease into utility included unit when possible.
- If families meet the eligibility criteria while in FRSP, they will also be considered for TAH/PSH. The recommended approach to determine eligibility within three months is to ensure that qualifying families are connected to long term support as soon as practicable.
- Who provides case management services for families who qualify for TAH?
  - DHS staff for will provide TAH case management.
- How will customers have access to TAH and PSH if they don't have access FRSP?
  - Families can only be eligible for TAH/PSH from Shelter or FRSP TANF model
- How closely does this model mirror the existing TAH/PSH criteria?
  - The TF recommended bridge model is designed to connect families to long-term housing program while they are in shelter or within three months into FRSP. Per this model, if vouchers are not available, families will remain in the FRSP program receiving TAH/PSH services until voucher becomes available.

#### Additional written comments and DHS response:

- Clients eligible for TAH/PSH may be identified later in the process, how can families move between models
  - Yes this will be permitted. See update under clarifying questions
- There are a limited number of annual vouchers, what happens to families who do not get a voucher?
  - Funds permitting, eligible families will remain in FRSP Bridge model until they are matched with a voucher.
- How can families from prevention enter the program?
  - Families can only be eligible for TAH/PSH from Shelter or TANF FRSP model.
- How will we serve dually diagnosed complex families?
  - Families with complex needs who meet the PSH criteria will be matched to a PSH case manager.

**DHS RECOMMENDATION:** Do not proceed with Task Force recommendation as proposed. DHS is concerned with implementation of this pathway. These criteria are somewhat subjective and the potential universe of families who qualify could easily exceed resources available through the homeless services continuum of care. For instance, 2019 point-in-time count indicate more

than 30% of families reported one or more disabling conditions<sup>2</sup> (physical or developmental disability, severe mental illness, etc.). Setting expectation that all who meets the criteria above will eventually bridge to a voucher is not cost feasible and has the potential to be interpreted as a right.

Moreover, situations are dynamic and with access, reasonable accommodations, and essential supports, people with disabilities are able to achieve successful careers. DHS believes that the quality services that will be available through the enhanced FRSP TANF model will enable households that do not receive a voucher to pursue career advancement activities that will enhance economic and housing stability.

Alternative Approach for TF Consideration: in light of the above challenges, DHS would like to present the following alternative approach for the task force members' deliberation:

Eligibility Determination: realizing situations are dynamic; DHS recommends streamlining the current assessment to long-term housing subsidies to prioritize and connect families to appropriate services:

- The first assessment will be done in shelter via an F-SPDAT assessment to determine immediate need and assign the family the right case management model. Eligible families will be assigned to a TAH/PSH case manager and exit shelter via FRSP Bridge model.
- The second assessment is completed within 3 months of entering FRSP Bridge model. At entry to the Bridge model, unlike the current practice, families will be assigned to a TAH/PSH case manager who will conduct a psycho-social assessment to determine level of service need and identify candidates for Family Coordinated Assessment and Housing Prioritization (F-CAHP) process.

Voucher Assignment:

- DHS understands that the number of families eligible for vouchers surpass the number of available vouchers for the year. Assigning families to vouchers in the absence of dedicated funding for the vouchers is neither cost and nor operationally feasible. DHS recommends making voucher eligibility determination and assignments based on the number of available vouchers for the given fiscal year.
- Families identified as candidates for TAH/PSH will be prioritized through the F-CAHP process. DHS will work stakeholders to enhance the F-CAHP process to ensue efficient connection to long term housing programs for eligible and prioritized families.
- Families who exit shelter under the Bridge Model but do not receive a voucher will be assigned to an FRSP TANF provider and continue in the FRSP lease. . DHS will also work in partnership with Rehabilitation Services Administration within Department of

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<sup>2</sup> Point-In-Time Count of Persons Experiencing Homelessness in the District of Columbia  
[https://dhs.dc.gov/sites/default/files/dc/sites/dhs/page\\_content/attachments/2019%2BDC%2BPIT%2BResults%20%281%29.pdf](https://dhs.dc.gov/sites/default/files/dc/sites/dhs/page_content/attachments/2019%2BDC%2BPIT%2BResults%20%281%29.pdf)

Disability Services to explore eligibility for employment opportunities and help families develop an Individualized Plan for Employment (IPE).

- DHS will continue to monitor the number of families who met the eligibility criteria for a long-term housing subsidy but were not prioritized for a voucher. DHS, in collaboration with stakeholders, will use this information to plan for additional resources.

WORKING DRAFT

## TANF Model

### Task Force Recommendation:

#### Eligibility

District residents:

- who have been deemed eligible for homeless services after being assessed at the Virginia Williams Families Resource Center
- who are currently in shelter or referred to FRSP from Homelessness Prevention Program; and
- who are receiving TANF or are working but not earning enough to pay market rent

#### Program length:

Each family remains in the program based on individualized needs and program timeframe is determined when a family is assessed at intake. Families may be eligible for a one-time six-month extension prior to exit based on the following criteria: education/training program that ends within the 6-month extension period or a recently diagnosed medical condition and/or a change in the employment status such a job loss during the original term of the lease.

DHS recommends that there also be periodic assessments points throughout the program period which will occur on a quarterly basis at the joint TEP and FRSP case manager review session. The quarterly assessments are not extensions but rather platforms to ensure families are 1) receiving all the required services, 2) progressing on their goals, and 3) participating in case management services.

12 months	24 months	36 months
<ul style="list-style-type: none"><li>▪ <b>Education:</b> High School Diploma (or higher)</li><li>▪ <b>Employment:</b> Employed in the past 6 months Connected to community resources, including TEP vendors, that are assisting the family to gain and maintain housing stability with employment expected within 6 months of admission.</li><li>▪ <b>Health:</b> Experience temporary hardship or setback (ex: injury on</li></ul>	<ul style="list-style-type: none"><li>▪ <b>Education:</b> GED or equivalent to high school diploma</li><li>▪ <b>Employment:</b> Currently unemployed but has history of employment in the past 12 months.</li><li>▪ Underemployed (income is at 50% of market rent)</li><li>▪ Enrolled in job training program</li><li>▪ <b>Health:</b> Currently pregnant or has a child under 1 year old</li><li>▪ <b>Other Barriers:</b></li></ul>	<ul style="list-style-type: none"><li>▪ <b>Education:</b> Minimal Education-Has not attained a GED or equivalent</li><li>▪ <b>Employment:</b> Unemployed and has no history of employment in the past 18 months.</li><li>▪ <b>Health:</b> has a long term treatable medical condition that doesn't qualify for SSI</li><li>▪ <b>Other Barriers:</b><ul style="list-style-type: none"><li>○ Two or more evictions</li><li>○ Open case with CFSA</li><li>○ Criminal background</li></ul></li></ul>

<p>the job) and is expected to recover and maximize employment potential within a year</p> <ul style="list-style-type: none"> <li>▪ <b>Other Barriers:</b> None</li> </ul>	<ul style="list-style-type: none"> <li>○ Youth Head of Household</li> <li>○ One eviction</li> <li>○ Aging out of the foster care system</li> </ul>	
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**Case Management:** includes additional DHS clarifications.

TEP Case Manager	FRSP Housing Case Manager
Active Case load: 1:30	Caseload 1:30
Will be the lead in attaining employment and education goals. The goal is to help families make enough to pay housing costs - e.g. market rent and utilities (up to 50% housing cost burdened).	Will provide housing case management (e.g. paying rent, household maintenance, tenant rights and responsibilities, landlord relationship, etc.) And connection to supportive services (e.g. credit repair, health, children's education, etc.) to provide a wrap-around support for the family.
<b>Teaming:</b> initial and quarterly joint case conferences with TEP case manager and family	

### Education and Employment:

- Individualized goal setting and service coordination by TEP case manager to achieve income goals within the FRSP time frame
- Access to all type of TANF employment/education programs and incentives (see below)
- Quarterly joint case and goal review by TEP and FRSP case manager
- TANF Employment Provider engagement is required in order to remain eligible for the FRSP program and housing subsidy beyond initial year of FRSP, unless the family has declined TEP and can provide documentation of comparable accountability for goal progress on education and employment.

### TANF Employment/Education Program Provider Types

Services	Customer Needs	Program
Job Placement Services	Employment	Job Placement Service Provider (JP)
Education Services	Education and training	Education and Occupational Training (EOT)
Behavior Health	Strengths based approach to employment service or behavioral health needs	DHS Office of Work Opportunity (OWO)
Multigenerational Services	Family stabilization	Variety of providers

### TANF Incentives

Education Incentives (EOT)	<ul style="list-style-type: none"><li>1-day training completion - \$50</li><li>30-day training completion - \$200</li><li>1-3 month training completion - \$400</li><li>4-6 month training completion - \$600</li><li>7+ month training completion - \$1,000</li></ul>
Job Placement (JP)	<ul style="list-style-type: none"><li>Job placement - \$150</li><li>Retention month 1 through 11 - \$150</li><li>Retention month 12 - \$500</li><li>Promotion - \$400</li><li>Exit from TANF due to earnings/4 months - \$500</li></ul>
Both EOT and JP	<ul style="list-style-type: none"><li>\$15 daily stipend for 4 or more hours of approved activity</li><li>\$250 per 12 months for discrete work related expenses</li></ul>

### Landlord Management:

- Families will sign initial 12-month lease
- After a year, depending on the individualized case management plan, families may lease in place, find a new unit or reconnect with family members.
- Consistent communication by family and FRSP case manager with landlord to solve tenant/landlord issues
- FRSP case manager will work with landlords to inform of program status and to reiterate program goals and expectations of both landlord and family

**Exits:** includes additional DHS clarifications and additional recommendations.

- Families' length of stay in the program is determined by an assessment completed upon entry into the program.

- Families must participate in quarterly joint case and goal reviews with their TEP and FRSP case manager.
- Transition between categories within the program will be based on assessment that is completed at the quarterly review session(s).
- Long term planning is built from the onset of the program and together with the family, FRSP and TEP case managers will be modified and reassessed on a regular basis. Understanding that there are limitations on the ability to extend FRSP subsidies, long term planning will also include focused. Exit planning with the TEP and FRSP case managers to establish a transition plan within 3 months of the program exit date.
- Failing to engage with the TEP vendor may result in early program termination.
- An extension or termination determination will be made at 9 months and at each subsequent review 90 days before the lease ends. The initial extension determination will be made at 6 months to provide the family an opportunity to engage in case management activities and possibly change the determination at the final review at 9 months.
- FRSP Case Manager will work with family to identify whether the family is going to remain in the current unit or work to identify another unit.

#### Task Force Comments on the TANF Model: Clarifying responses by DHS.

- Is joint FRSP TEP case management and TEP programming feasible?
  - The feasibility and success of this model depends on the accountability of DHS and providers to enhance the quality of services, as well as the accountability of families to engage in services.
  - However, given the complexities of vendor contracts being issued separately by ESA and FSA via TCP, it is likely that feasibility will vary across situations, vendors, and families.
- Does the fixed term based on family strengths and barriers with single 6 month work?
  - This is a recommendation forwarded by customers. It is believed to address challenges that families face with the uncertainty caused by 3 month extensions that are not aligned with lease terms.
- Aging out of the foster care system? If a family has had any CFSA involvement would they be in this group (36 months)?
  - Only families with open CFSA cases and who meet at least one of the other criteria will be eligible for the 36 month term.
- Are the bullets in the criteria for length of program “ands” or “or”?
  - Families must meet at least two of the criteria listed in the 24- or 36-month programs in order to be eligible for the extended programs. If these criteria are not met, families will be enrolled in the 12-month program.
- Why do you want case management services enhanced?
  - In the opinion of customers, case managers are not providing quality services. In addition, a number of families are staying in the program past 18 months. Enhancing case management services is believed to support families to advance their education and employment goals, connect to needed services and promote more positive exits from the program.

#### Additional written comments:

- Is there another pathway for families not eligible for PSH/TAH and not on TANF?
  - Yes, families who are not eligible for Bridge FRSP can enroll in the TANF model (families are working but not earning enough to pay market rent) or possibly a Combined Benefit Model, should such a pilot become feasible. Working families in the TANF model will provide documentation of comparable accountability for goal progress on education and employment to the FRSP case manager but not be required to engage with TEP provider.
- How will you address families on exemptions/POWER? (Under TANF rule, families can be exempted from work participation if they are pregnant or have a child under one. Under POWER, families who are experiencing domestic violence, caring for family members or are facing similar barriers are also exempt from work participation and their time stops counting towards the 60 month TANF time limit.)
  - DHS is considering how best to approach this issue and determine the feasibility of allowing those families in POWER and/or with exemptions to have a FRSP extension for the period of time they are exempted from work activity. However, considering FRSP is a time limited program families would be encouraged to participate in work activities as soon as practicable.
- How will this work with CAHP?
  - Families that are assessed for PSH or TAH will have to go through the CAHP process to be matched to a long term housing resource. Voucher eligibility and assignment will continue to be managed via the CAHP process. Under existing governance, the CAHP process would need to be revised to determine how to accommodate the Bridge model changes that are proposed by FRSP task force members.
- Completing the assessment at VW during a crisis increases a family's score on the SPDAT
  - Eligibility will be determined once families are in shelter and/ in the first three months of FRSP (as families as assessed throughout the program). Virginia Williams Family Resource Center will only conduct assessment to determine eligibility for homeless continuum of care.
- The integrated TEP/FRSP model through the same agency with two case managers working closely together is favorable
  - This alternative approach is being forwarded for consideration at the next Task Force meeting. See below.
- Two generation model can be intense, staff need lower caseloads
  - See updated case load.
- Need clear criteria for recommended program timelines: 12, 24, 36 months
  - See table above. DHS will further work with providers and customers to clarify the criteria. Additional consideration is also presented below to match extensions with milestones.
- If and how will extensions work

- Extensions will be considered for families who are facing barriers or for families who need more time to attain an employment or education milestone as long as they remain engaged with case managers and there are sufficient resources for DHS to be able to make extensions.
- Standards for case management services
  - DHS will review current standards as well as monitoring to identify necessary changes that will assure greater quality of services delivery and better program outcomes.
- Escrow rent or allow families to have matched savings account
  - Not applicable with current regulation. Recommendation forwarded for consideration.
- Are TANF incentives counted as income?
  - No
- Increased income is not aligned with HUD 30% standard income requirement
  - See below for recommendations and options on client share of rent.
- No DC voucher should be taken outside of DC
  - Families requested option to use FRSP in MD and VA to provide families an opportunity to identify units outside the District that are within their affordability range. DHS presents this recommendation for the task force's consideration and voting.

### **Landlord/Provider Comments on the TANF Model (received after TF #3 meeting)**

#### *Shelter Staff Perspective*

- Provider meeting trainings regularly
- If client is connected to TEP Case Manager, both case managers have CATCH access and should be aware of each other and what's going on within both sides
  - DHS will provide training and access to CATCH system

#### *FRSP Staff Perspective*

- Enhance onboarding for FRSP case managers and emphasize TEP and DHS Programs
- Handout list of resources to families to help mitigate barriers and access services
- Highlight relationship between secondary providers and primary providers. Have the ESA/FSA summit two times a year where case manager can attend to see how they fit in the continuum of care to reinforce the relationship. Make the event interactive and fun
  - This is being implemented
- Include TEP and DHS program as part of provider supervision and coaching
- Teaming
  - Joint case management
  - Unified case plan. Shared goals to avoid duplication of services and resources
- In order for the model to be successful buy in and oversight are required.
- Recognize providers for teaming and collaboration at summit (ESA/FSA)

- Give certificate and recognition (public)

**DHS Recommendation and Alternate Program Design for Task Force Consideration:** Do not proceed with the Task Force recommendation as proposed. Alternative approach provided below with the reasons why the recommendation is not feasible.

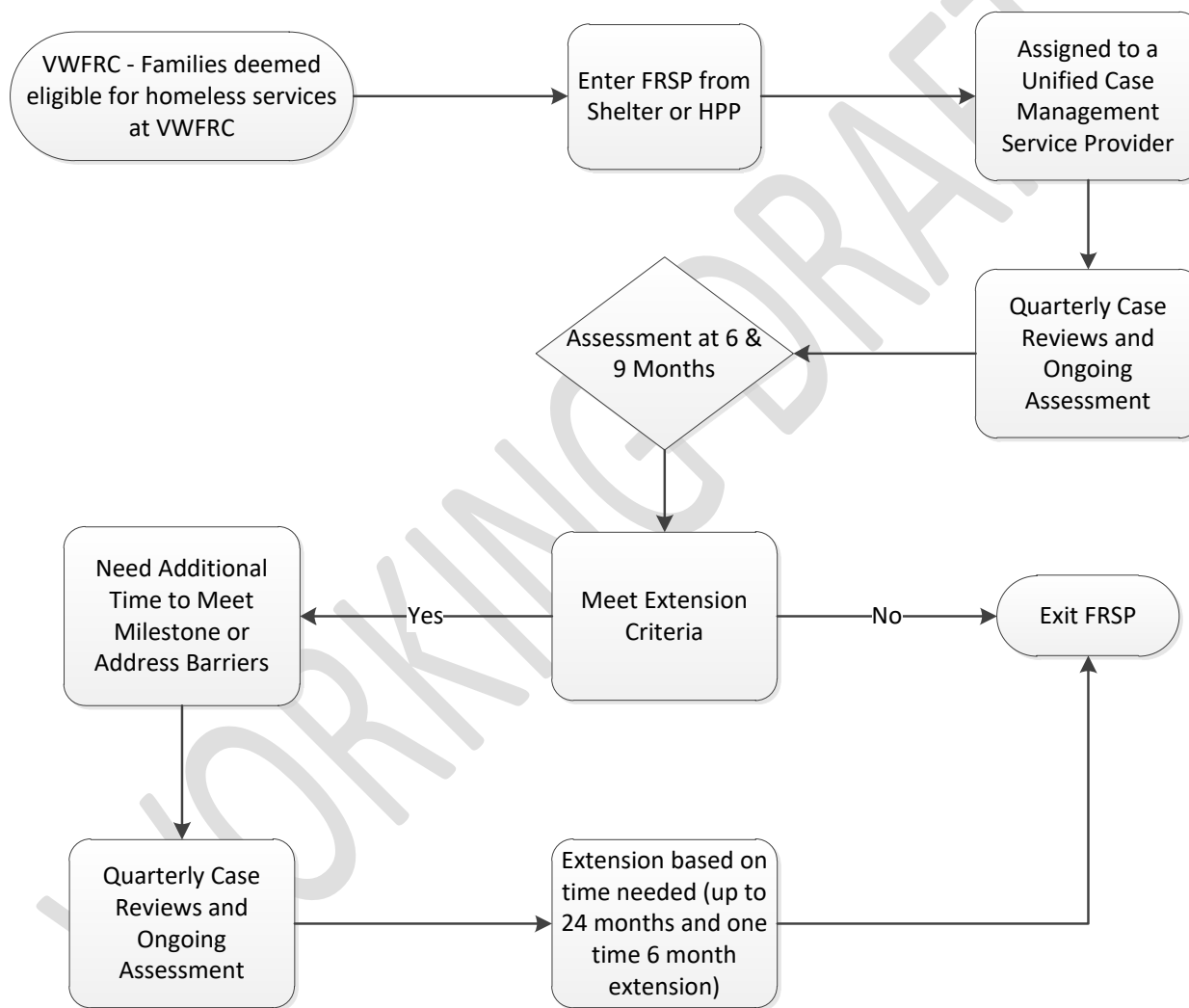
- I. Case Management Assignment and Program Length of Stay for TANF Model:** recognizing the request from families for an individualized case management, greater provider accountability, client accountability, and improved quality of services, the following alternative case management service delivery model for families receiving TANF is presented for the task force's consideration:

Task Force Proposed Program Function	Challenge(s) to Implement	Potential Option(s)
FRSP Program Length Determination takes place via assessment in shelter or while in FRSP to determine a 12, 24 or 36 month program timeframe	<p>This approach does not address when family situations change over time</p> <p>The approach also emphasize on barriers as opposed to inclusion of strength-based goals.</p>	<p>In order to provide supportive rental assistance and case management services, shift to a model which provides a base program period of 12 months with an option to request a program extension which will be reviewed based on the following factors:</p> <ul style="list-style-type: none"> <li>▪ The time it takes to complete the family's educational and training milestones or</li> <li>▪ The time it takes to address the barriers identified at the beginning of the program</li> <li>▪ Progress made towards employment and/ or education goals</li> <li>▪ Percentage of rental payments made</li> <li>▪ Participation in quarterly case reviews and engagement with TEP or other services</li> </ul> <p>This will provide an opportunity to complete</p>

		<p>ongoing assessment as opposed to one-time assessment conducted at entry to determine length of the program.</p> <p>The approach also follows empowerment model and provides families supports needed to attain milestones</p> <p>The approach also establishes bases for accountability for service providers and program participants</p>
Case management services provided by both a TEP vendor (for employment and education) and a housing case manager to assist in housing areas	<p>This is not operationally feasible. In cases where a family does not engage in timely/regular manner with TEP vendor, they would be removed from the TEP vendor's case load and once they re-engage a new TEP vendor would be assigned (based on availability).</p> <p>This would create a situation where a family could have multiple TEP case managers during their time in the FRSP program, or could continue receiving rental subsidy without an employment/training case manager.</p>	<p>FSA will work with ESA to create a contracting vehicle for the provision of Unified Case Management Service (TEP and housing) by a selected provider. In this way, families will only be assigned to one provider organization with a clear set of outcome requirements that address employment, education, housing needs and barrier remediation. Through these performance based contracts, providers will be compensated for helping families attain employment, educational and housing goals. This will alleviate the possibility of a family getting sanctioned and removed from a from a TEP provider's case load while in FRSP and ensure continuation of employment services/education for the FRSP program period. The</p>

		employment/education services will mirror the current TEP services and incentives.
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## Referral Process:



DHS also recommends these additional enhancements to the TANF model:

- Families may opt to decline FRSP case management (no-services model) which provides 12-months of rental assistance only.
- Families who enter the TANF model from the Bridge model should be offered an initial term of 12-months in TANF model and be able to choose between services or no

services model. Families who choose the services model will be eligible for extensions per the criteria described above. Total time in FRSP (Bridge and TANF) may not exceed 30 months.

- To avoid a cliff upon exit and provide strong support while the family is engaged in education, training, and job seeking, rental payments could be fully subsidized then shift to being rent-based rather than income-based during the step-down subsidy phase.
  - Families who opt for services engagement would pay 30% of their income for rent during the first 12 months of participation plus any additional period of time before the final step-down phase. During the step-down subsidy phase, the tenant portion of the rent will be pro-rated across six months to increase from the subsidized level to full rent payment. The landlord payment will be adjusted accordingly (see examples later in this document).
  - Families who choose the no-services model would pay 30% of their income during the first 6 months then the tenant rent share will be pro-rated to be full rent at exit.
  - Families that receive a program extension would continue to be subsidized until they begin step-down subsidy phase.
- Families should be eligible to receive up to 50% of the rental portion that they paid to FRSP as a bonus upon successful exit from the program. To be eligible for the bonus, families must pay their share of the rent on time and comply with the lease requirements.

DHS also recommends additional program improvements to enhance housing stability and sustainability:

#### A. [The DC Flex Pilot Program](#)

The DC Flex Program is a new type of housing assistance being tested in the District. The program is for low-income households that are working and earning income, but have trouble making ends meet in some months. Right now, the program is a “pilot” program, which means there is a small amount of money to test this idea. Researchers are currently evaluating the pilot program. Approximately 150 households will be selected to participate during the pilot phase. If the program is successful, DHS hopes to expand it. Families that are participating in FRSP TANF model and have been able to obtain employment but have a gap between their housing costs and their income could benefit from this type of assistance.

DC Flex clients must participate in an annual recertification process to confirm continued program eligibility and participation. These requirements are:

- Be at or below 30% of Annual Median Income for the Washington DC Metropolitan Region
- Retain physical custody one or more dependent children; and
- Remain a leaseholder in good standing.

## B. Pilot Combined Benefit Model:

The current public benefit programs have inconsistent eligibility criteria and operate separately and without consideration for household needs and costs of living. The result is that households experience penalties to increasing earned income, which impedes career development and attaining family sustaining employment. An increase in income often results in fewer net resources in households. In addition, FRSP only provides short term rental subsidy (12-30 months). As a result, families in FRSP and similar public benefit programs must trade off long-term career opportunities for short-term, minimum wage employment opportunities – impeding meaningful pathways to self-sufficiency.

DHS is interested in exploring the potential for a Combined Benefit Model (CBM) as a pilot program aimed at removing these structural barriers that prevent families from achieving long-term career opportunities through the provision of combined cash benefit. Families will have the opportunity to budget and utilize the combined cash value of the benefits to address their needs while working on long-term housing and career plans and will be protected from losing assistance at a greater level than their growth in earnings.

The pilot model would provide a pathway for families in FRSP TANF model pursuing a two to four-year college degree or other career pathway training geared towards increasing the household's income to meet the cost of living. It takes into account the following financial supports currently being provided to families:

DHS Public Benefits	Annual Benefit	Monthly Benefit	Annual Benefit amount based on a household size of 1 adult and 2 children
TANF	\$6,036	\$503	Monthly gap to living cost: \$287 Annual gap to living cost: \$3,441
Housing (FRSP)	\$17,640	\$1470	
Health Care	\$10,740	\$895	
Child Care	\$25,612	\$2,134	
SNAP	\$6,531	\$544	
Total	\$66,559	\$5,546	
Amount needed to afford a unit in DC	\$70,000	\$5,833	

The Combined Benefit Model would essentially supplement a family's benefits with an additional cash benefit of \$3,441 to bring the family to \$70,000 of annualized public benefits.

### Who may be eligible for a CBM pilot?

Families in FRSP TANF model pursuing a two to four-year college degree or other career pathway training geared towards increasing the household's income to meet the cost of living.

Families must be fully engaged in FRSP (e.g. paying share of rent and following through on goal plan and other FRSP requirements) when they apply to participate in the CBM pilot.

**Program Length:**

Up to 48 months with yearly recertification to maintain eligibility

**Case Management:**

Case management would consist of monthly check-ins which will take place in the home for the first six months of the program period with quarterly check-ins after the first six months. The case management service will be provided by the FSA – Office of Work Opportunity case management team.

**Education and Employment:**

Families in the pilot Combined Benefit Model would have a TEP Case Manager specific for the UDC Paths program or similar programs, as they are fully engaged in a two- or four-year program. Towards the end of their programs they will work closely with their TEP case manager to find long term employment options based on their recent educational attainment.

**Landlord Management:**

- Families will sign initial 12-month lease consistent with FRSP TANF model
- Communication with landlord to solve tenant/landlord issues as needed
- The FSA – Office of Work Opportunity team case manager would be responsible to monitor the landlord management.

**Exits:**

Families will exit the program upon completion of education programs with gainful employment, not to exceed 6 months post-graduation.

If the head of household discontinues the program the family will be exited from the pilot and will be assessed for any other eligible services (to include FRSP Bridge or TANF Models).

**Program Enhancements/Improvements**

1. Administrative
2. Assessment
3. Data and evaluation
4. Housing and financial assistance
5. Program services and offerings

The next section reflects the TF #3 recommendations with comments from TF members following this section. DHS documented TF member's statements and addressed questions posed. DHS recommendations are documented at the end of each section.

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## Administrative

- Accountability and transparency – customer-facing
  - Clear communication
  - Client handbook on how to navigate homeless services
  - Simplified language in FRSP program rules
  - Criteria for entering
  - Criteria for exits
  - Ombudsman – single person covering for all program components/aspects

**DHS Recommendation:** DHS will continue working on developing client facing documents. As DHS implements a housing first approach, there are limited criteria for entering FRSP: families in shelter, HPP and DV are eligible enter FRSP based on the assessments completed at the programs. DHS will hire an FRSP ombudsman who will be able to field FRSP client concerns and work to resolve. Recommendation about exit included at the end of this section as part of advocate feedbacks.

- Accountability, consistency, and transparency – staff roles/responsibilities
  - Clear expectations for TCP, FRSP contractors, DHS, and DCHA
  - Clear communication
  - Consistency among FRSP providers
  - Hold case managers and providers accountable for performance outcomes
  - Improve contract monitoring/oversight
    - Outside oversight and review
    - Outside oversight of DHS
    - Better oversight of DCHA

**DHS Recommendation:** DHS will establish a customer advisory group composed of families, FRSP providers, TEP providers, DHS (ESA/FSA), advocates and ICH to ensure transparent accountability, receive and address concerns about program quality.

- Accountability, consistency, and transparency – Office of Administrative Hearing (OAH)
  - Clear communication
  - Process
  - Manual
  - Representative for participant

DHS Recommendation: DHS will work with ICH and OAH to implement the recommendations forwarded by task force members. DHS will establish a timeline for implementation working with stakeholders.

#### **Additional Comments from Task Force Members and DHS Responses:**

- Need to reconcile with actual practices with voucher expiration and placement
  - DHS: In order to ensure program efficiency to serve more families with the limited resources, families in FRSP Bridge model will sign a lease in place within 60 - 90 days. Families will be able to sign a new lease after the first year.
- The client needs to be held accountable to meet with the case manager and employment, training etc. to improve their circumstances.
- I feel the client does not have to be accountable for their situation. Enact making eligibility to transition “explore” at 3 months may push providers to make a referral sooner
  - DHS: In order to successfully implement the two models, there should be a clear accountability for program providers to provide quality services and families to engage in the services.
- It may be feasible if the caseloads are lowered as proposed
- Need more clarity on how recommendations will work. Who will provide outside oversight? How would accountability be measured (standards)?
  - DHS will establish a customer advisory group composed of families, FRSP providers, TEP providers, DHS (ESA/FSA), advocates and ICH.
  - DHS will hire an FRSP ombudsman who will be able to field FRSP client concerns and work to resolve.
  - DHS will set and enforce clear expectations for TCP, FRSP contractors, DHS, TEP, and DCHA

#### **Landlord and Provider Recommendations**

- TCP should maintain a list of trainings provided
- Onboarding training;
  - Provide community resources
  - Procedure to communicate updates. Someone should be assigned to update information
  - Actively look for new services
  - Quarterly sessions for update
  - Develop relationships with organizations
  - Invite families for community resources
- Detailed case notes and communications with each other
- Funds for additional case managers
- Pros: Case managers become better informed and equipped
- Provide timely report for rental payment to participants.

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## Advocate Recommendations – Exits, Client share of housing costs,

Upon the request of some advocate organizations, FSA hosted a listening session with advocate organizations since Task Force #3. The following feedback was received.

FRSP should have a fair standard for when people exit that is not based on just the passage of time, but individual circumstances. This goal can be achieved by additional staffing.

Some considerations before participants are exited should include:

- whether they received adequate case management;
- whether they have any chance of affording their housing on their own;
- whether they have been evaluated for all available long-term housing options (such as PSH, TAH or other programs) and,
- If qualified, whether appropriate referrals were made. Proposed legislative language is on the reverse side.

Increase stability during the program: The current rules for the program require participants to pay as much as 60% of their income towards the rent, not including utilities. The rules should be modified such that:

- Participants should be required to pay no more than 30% of their income towards their housing costs, including utilities
  - Task Force members recommended up to 50% rent burden
- The program should be required to timely pay its portion of the rent and participants should not be held legally responsible for the program portion
  - Through RPI DHS pays 100% of rent to landlords

**DHS Recommendation:** The considerations prior program exits are part of the current FRSP case management service requirements. DHS recommends forwarding the client rent share and definition of housing affordability or housing sustainability (30 or 50% of income) for task force voting.

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## Assessment – initial and ongoing

- Initial assessment
  - Quicker assessment at VWFRC beyond eligibility to begin case planning across programs (TANF, DBH, CFSA, etc.) rather than only being referred to homelessness prevention program and shelter (have someone to assist with linkage and care coordination)

- DHS response: Assessment at VWFRC has previously been implemented and was deemed ineffective. Assessments and eligibility determination are currently conducted once families are stable in shelter or enrolled in HPP.
  - Assessment should ask about current and past barriers
  - Clear eligibility criteria
  - Ranking/scoring families with complexities (children with special needs)
    - DHS will work with stakeholders to further clarify the eligibility criteria
  - Exit strategies developed at intake
  - Identify barriers (domestic violence, kids with autism, evictions, low employment, low education)
- Goal setting
  - Comprehensive, family centered, two generation, unified case plan
  - Eligibility for other housing programs
  - Housing affordability assessment
- Ongoing assessment
  - 3-month check-ins
  - Progress on goals and case plan
  - Update on barrier reduction and any new barriers encountered
  - Housing affordability assessment
- Housing affordability assessment
  - Conduct housing affordability assessment before families lease into a unit
- Assessment for readiness for program exit
  - Criteria for exits
  - Plan for assuring affordability of housing after the end of program subsidy
  - Eligibility for other housing programs

#### Task Force Member Recommendations

- Assessments should happen sooner and those eligible for permanent subsidies should never be in FRSP.
  - DHS response: the Bridge model is designed to address this
- Exits: no one should be exited if housing is not sustainable
  - Task force members recommended participants should be required to pay no more than 50% of their income towards their housing costs.
- Assessment remove objective process (VI-SPDAT)
  - DHS response: SPDAT and psychosocial assessments will be used in used to determine eligibility.
- There needs to be more staff dedicated to oversight of case coordination
- Strongly agree everything including a set training needs to start at the shelter level not wait until they move in because they are not taking the process seriously

- Are all providers working with the family/customer have access to CATCH system?
  - DHS response: we are working to make this possible
- How is information shared? There should be an assessment that is not totally based on self-report. It should be something that can be measured
  - DHS response: some information requires documentation, not just self-report (e.g. income, disability, etc.)
- If DHS adopts a structured assessment tool that is validated such as the initial adult assessment.
  - DHS response: The Task Force recommended an approach that is more about eligibility determination rather than a vulnerability/prioritization tool. We concur with this approach.
- How did customers determine case managers are not trained? Why end VI-SPDAT (Singles tool BTW)? Are customers clear on purpose of SPDAT tools?
  - DHS response: Customers object VI-SPDAT. DHS recommends using the SPDAT tool in conjunction with a psycho social assessment to understand risk factors and determine eligibility for long-term housing subsidy.
  - DHS response: Currently, case managers inform families the purpose of SPDAT tool.
  - DHS response: If customers have questions about the services they are being offered, they can raise their concerns to their assigned provider's management, TCP or DHS. DHS supports adding an ombudsman so that if client is not able to get concerns resolved through provider or TCP, they can contact the ombudsman for assistance.

#### Landlord and Provider Recommendations

- Case manager will bring a blank case plan where the customer will create their own goals and sign during the appointment
  - DHS response: we concur that ongoing case management practices need to be improved to be individualized to family goals and barriers.
- Reconsider the wording of the four main goals that are included on the case plan.
  - DHS response: Case plans will be revised to reflect individualized goals.
- Offering resources for the family as a whole and including information on case plan/case note (2 Gen)
  - DHS response: This is part of the current case management requirement
- Providing the case plan and information regarding customers progress to the vendor (2 Gen)
  - DHS response: Create electronic system for the customer to create and sign the case plan. DHS will work with the Office of Information Systems, TCP, providers, families, DCHA and landlords to create a client portal to submit documents and better way to track tenant payments to landlords
- Because participants are housed for 2-3 months before assignment to a case management agency, DHS can provide central point of contact for participant to use for all issues until case managing agency is assigned. And, More case manager slots needed

- DHS response: It is currently being implemented. In addition, DHS is working with TCP to expand FRSP provider capacity.
- Clarity about RRH program prior to lease up and, what message are participants receiving at lease up? Message needs to be changed
  - DHS response: Information about FRSP should be shared with families upon eligibility. DHS will review process to determine breakdowns.
- Gap between lease up and case assignment that creates a host of issues for participants
  - Document tracking (rent, identifying documentation)
  - No more warm hand off from shelter to FRSP
  - Activity tracking, etc.,
    - DHS response: DHS will work to resolve these issues with TCP and providers.
- Post lease up training
- Provide aftercare case management (from shelter) to support participants until (FRSP) provider is identified
  - DHS response: This is currently being implemented.

**DHS Recommendation:** Implement the recommendations forwarded by task force members. DHS will work with providers and families to establish housing affordability assessment.

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#### Data and evaluation

- Quality and comprehensive data collection
- Track income and earnings over time
- Track cash assistance and other benefits over time
- Match to other data systems to track actual earned income
- Track eviction data
- Track basic demographic data of families
- Data analysis to understand rental costs
- Clearly communicate ongoing data

#### Task Force Member Recommendations

- If the client has not met the first quarter goals or with their case manager then they should be brought in to have a conversation with DHS, Landlord, Case Manager- a teaming effort to show the service needs.
- Establish clear reporting requirements for providers and clear reporting requirements for DHS to council

**DHS Recommendation:** Implement the recommendations forwarded by task force members around data and evaluation..

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## Housing and financial assistance

- Expand financial assistance
  - Application fees
  - Furniture/other apartment set up needs
  - Budgeting Credit repair
  - Waive amenities fee and application fee from landlords
    - This is beyond DHS budget and authority. However, families are encouraged to identify units with no amenity fee and that include utilities.
- Revise participant rent share requirements
  - Minimum income requirements
  - Gradual increases in rent not to exceed 30% of income
  - Escrow rent
  - Reduce FRSP rental payments by participants to 30% of income and include utilities

DHS Response: Under the current program model, families are required to pay 40% - 60% of their income toward their rent. However, most families are not currently paying their share and there is no accountability measure in place to enforce compliance. The Task Force discussed revising participant's rental share to avoid cliff upon exit. Below is a proposed rental payment that avoids a cliff and provides strong early support that has been implemented by other jurisdictions for consideration:

### 12-month program:

- 1st 6 months – share is based on (30%) income
- 2nd 6 months – share is based on rent (sliding adjustment to full rent after exit)

### 12-month plus 6 months

- 1st 6 months – share is based on (30%) income
- 7-18 months – share is based on rent (sliding adjustment to full rent after exit)

### 24-months

- 1 - 12 months – share is based on (30%) income
- 13-24 months – share is based on rent (sliding adjustment to full rent after exit)

### 24-months plus 6 months

- 1 - 12 months – share is based on (30%) income
- 13-30 months – share is based on rent (sliding adjustment to full rent after exit)

### 36-months

- 1-24 months – share is based on (30%) income
- 25-36 months – share is based on rent (sliding adjustment to full rent after exit)

DHS Response: Some TF members recommended “escrow” for participant share of rent, but this is not allowed per DC regulations. One possible alternative to an escrow is that families could be eligible to receive up to 50% of the rental portion that they paid to DCHA as a bonus upon successful exit from the program. If TF is interested, DHS could explore feasibility of this option.

- Apartment options

- More apartments with affordable rents
- More apartments with utilities included
- Expand to MD and VA landlords
- Shared
- housing options

DHS Recommendation: The recommendation is forwarded to allow families to identify units within their budget. Some task force members objected the option of expanding apartment options to MD and VA. It should be forwarded to task force members for voting.

- More long-term subsidies

DHS Response: This is not within scope for FSA to provide long-term subsidies.

- Housing supports for participants

- Universal application for housing
- Better housing search assistance
- Better tenant protections
- Better tenant education
- Advocacy with landlord to address conditions of unit, other landlord issues.
- Better tracking of tenant payments to landlords

- Landlord engagement

- Improve inspection process and response to initial and ongoing property issues so participants are assured higher quality housing
  - Pest control
  - Carpet cleaning
- Faster inspections from DCHA
- Better relationships and communication with landlords
  - FRSP case managers should directly work with and be a resource to landlords when tenant is not following lease requirements
  - FRSP should improve communication and planning with landlord for participant exits
  - Develop alternatives to landlord evictions at end of FRSP (e.g. FRSP moves tenant to other housing)

- Lease in place options
- Landlord notification when the program ends, and the subsidy stops
- Better landlord protections when participants don't pay rent after program ends

#### Task Force Member Recommendations

- DHS should be sure to partner with other government agencies that provide some services – for example, DISB does credit improvement and budgeting
- Shouldn't be moving people to MD/VA at the expense of their public benefits
- Have concerns about apartment options (e.g. rent in Maryland and Virginia)
- Case assistance should be much more flexible and consider calculations deductions such as disability, utilities, etc. Currently FRSP is a "one size fits all" model
- Agree with the apartment options; not sure about participant requirements; Really support expansion to Maryland and Virginia
- The clients have to have some sort of responsibility, nothing in life is free. They should pay a third of the fee.
- Families should be able to use their voucher if they have another family member who is in shelter so that funds that were supposed to be used for shelter can be allocated to another family that doesn't have the same support
- Concerned about expanding to Maryland and Virginia and the extent to which that displaces community member from their hometown
- I think city council might consider restrictions at application fees
- Some change recommendations are COC controlled. Landlords need to agree.
- Job cap is not realistic. Customers will not be prepared to assume full market rent at transition. Escrow is not realistic to lease holding customers.

#### Landlord/Provider Recommendations

- Fees beyond rent
  - Not cost effective to include all fees for all landlords
  - Tenants abusing "all inclusive"
  - If the tenant's portion is decreased like a tenant allowance like TAH clients
    - Con: will cost FRSP more
    - Pro: if their portion go down, they may be more likely to pay
    - Alt: if client isn't paying or abusing have team meeting w/ client and FRSP
  - Resident should be responsible. Promote independent living
  - Education needed. Provide forum for all residents. Provide materials around utilities
  - Application fee. Landlord choice
  - Can client afford application fee?

DHS Recommendation: DHS has established a Landlord Engagement work group in collaboration with TCP, ICH, and DCHA to engage and service landlords, track available units,

and manage the matching and lease-up process in order to improve landlord and client experience within the District's homeless assistance system and to increase the rate of housing placement. DHS will explore the suggestions around housing support and landlord engagement under this work group.

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### Program services and offerings

- Accessible information for participants
  - Clear program manual for clients; repeated communication about program expectations, resources, etc.
  - Client portal to submit documents and better way to track tenant payments to landlords
  - Manual or training on how to maintain an apartment
- Improved case management services
  - Provide case management at admission to FRSP; match to case managers upon lease up
  - Multigenerational approach
  - Services beyond 9 am – 5 pm
  - Lower case loads
  - Individualized services
  - Engaged client participation
  - Client directed goal setting
  - Clear exit criteria
- Better linkage and case coordination to other services
  - Training and education
  - Mental health services
  - DOES
  - Childcare
  - GED
  - Job readiness/job training
  - Other DC offerings
- Expand program offerings
  - Credit repair
  - Housing search
  - Housing maintenance
  - Safety net program approach
  - Non mandatory case management for people who do not need it

### Task Force Member Recommendations

- Non mandatory case management for people who do not need it

- Need more oversight/requirement of the coordination of multi-agency case planning
- Clearly define the responsibilities for TEP and FRSP case manager responsibility to avoid service duplication
- Feasible if FRSP caseloads are lowered
- Need to discuss FRSP Case manager to customer ratio

#### Landlord and Provider Recommendations

- Enhance the onboarding process
  - Theory and practice
  - Streamline process and provider best practices
  - Sharing resources, FAQ's
  - Scenario based
- Landlord provider partnership
  - Onsite case management session
  - Joint orientation
  - Meeting with family to sign lease and review house rules (in addition to lease up)
  - Allows us to effectively address maintenance concerns
  - One-page information sheet provided
  - Rent café (pay online)
  - Monthly teaming with provider
  - FRSP provider/program manager meetings (bi-monthly)
  - Creating a share point drive for community resources
- Communication
  - Assigned case manager information/number and provider information
  - Notification in change of case manager
  - Case managers need monthly rent ledger from landlord if no HAP contract

DHS Recommendation: DHS will work with stakeholders to implement the above program services and offering to make information accessible, improve case management services, reduce caseloads - based on availability of funding, and develop better linkages to programs. However, these enhancements will not bear positive outcomes in the absence of full client participation and provider accountability.