

FY 2023-24 Housing Solutions Fund Guidelines September 2023

The San Gabriel Valley Council of Governments (“SGVCOG”) Housing Solutions Fund was established using Measure H funds allocated to the SGVCOG through the Local Solutions Fund (“LSF”) and administered in alignment with the requirements established in the SGVCOG’s Measure H Agreement with the County of Los Angeles.

A minimum of \$550,000 of the Local Solutions Fund funding is anticipated to be allocated to the Housing Solutions Fund. These guidelines establish the policies and procedures to ensure proper expenditure of funds and ensure that all funds are expended in alignment with the requirements of the SGVCOG’s Agreement with the County of Los Angeles.

Funding must be expended by June 30, 2024.

Purpose

The Housing Solutions Fund is established to provide service providers and cities with an additional resource to support clients experiencing homelessness or at-risk of homelessness, in addition to those resources available through the broader homelessness system in Los Angeles County. These funds are specifically for direct costs associated with housing, rehousing, or stabilizing clients, not to fund staffing costs for case management, problem solving, and housing navigation to support clients. The program is focused on providing additional financial resources to agencies that have the existing capacity and expertise to ensure that funds are used in the most efficient and effective way to support clients. The Housing Solutions Fund should not supplant any existing resources that service providers or cities can access.

Process

The Housing Solutions Fund will be administered by local partners that have been approved by the SGVCOG through a simple application process and with whom the SGVCOG has an executed agreement. The SGVCOG’s application process will ensure that administering entities meet the minimum financial and service qualifications. The SGVCOG intends to execute an agreement with any eligible entity that meets these minimum qualifications.

Eligible Entities

- Service Providers
- Local Jurisdictions/Public Agencies

Please note that, by executing an agreement to participate in the Housing Solutions Fund, your agency is agreeing to abide by the guidelines outlined in this document. Any expenditures that are not in accordance with the guidelines will not be reimbursed, and the SGVCOG will immediately terminate an agreement with an agency that is not following the guidelines.

Minimum Qualifications

All Entities

- Must have at least 2 years of experience providing homeless and/or housing assistance services in Los Angeles County¹;
- Must be in good standing in the State of California;
- Must have at least 1 designated, trained staff administering the program for the duration of the grant;
- Must have suitable accounting, financial, and administrative systems for documenting grants and contracts, including a system of internal controls;
- Must have adequate financial resources to perform the contract;
- Must meet the minimum insurance requirements;
- Must have an established system of collecting and managing client data in a way that meets all client privacy and security requirements;
- Comply with all subcontractor terms of the SGVCOG's agreement with Los Angeles County

Public Agencies

- Each assigned staff must complete problem-solving/similar training

Non-Profit Agencies

- Must have IRS 501c(3) tax-exempt status;
- Must complete problem-solving/similar training or provide problem-solving training certification

Please note there are two upcoming LAHSA Problem-Solving trainings for non-HMIS users/Key Partners. Applicants can apply for the training [here](#).

Application Process

To administer the Housing Solutions Funds, each partner must submit an application, which can be found [here](#). Any eligible agency that meets the minimum qualifications can apply. As part of the application, applicants must demonstrate the following:

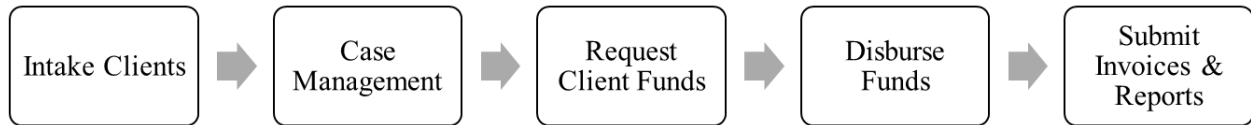
- Agency meets the minimum qualifications;
- They have trained staff to work with clients and perform case management;
- They have a defined process, with adequate controls, that allows for the proper disbursement of funds by the funding deadline;
- They have the ability to carry-out the outlined process for the duration of the agreement.

Applications will be accepted from September 20, 2023, to October 31, 2023. The SGVCOG intends to execute an agreement with each entity that meets the minimum qualifications and evaluation criteria, on a first-come, first-serve basis, pending funding availability.

Applications will be reviewed on a rolling basis, with expected notification of award approximately 2 weeks after a complete application is received. SGVCOG staff may request additional information if necessary. **Selected agencies may be subject to an audit by internal SGVCOG audit staff to verify their financial ability to comply with the program requirements.**

¹ If an agency does not have at least 2 years of experience, the key staff person must have at least 2 years of experience.

As part of the application process, each entity must indicate its process for disbursing funds, from client intake to invoice/report submittal. Specifically, each agency must demonstrate how it will complete each step in the process below:



Each entity must fulfill the minimum organizational and implementation requirements in order to enter into an executed contract with the SGVCOG. The SGVCOG will evaluate the following criterias:

<p><u>Organizational Criteria:</u></p> <ul style="list-style-type: none"> ● Has at least <u>2 years</u> of experience providing homeless and/or housing assistance services in Los Angeles County ● Has at least 1 designated, trained staff administering the program for the duration of the grant ● Demonstrates having suitable accounting, financial, and administrative systems for documenting grants and contracts, including a system of internal controls ● Has an established system of collecting and managing client data in a way that meets all client privacy and security requirements 	<p>Y(1)</p> <p>Y(1)</p> <p>Y(1)</p> <p>Y(1)</p>	<p>N(0)</p> <p>N(0)</p> <p>N(0)</p> <p>N(0)</p>
<p><u>Implementation Criteria:</u></p> <ul style="list-style-type: none"> ● Demonstrates a history of staff who have experience with implementing and managing housing and homeless programs involving flexible funds <ul style="list-style-type: none"> ○ Can fulfill the roles and responsibilities of Project Administrator and Designated Implementer(s) as stated in the Housing Solutions Fund Guidelines ● Displays the ability to ensure funds are expended consistently with the funding guidelines ● Has experience completing and submitting monthly invoices and quarterly reports by a given deadline 	<p>Y(1)</p> <p>Y(1)</p> <p>Y(1)</p>	<p>N(0)</p> <p>N(0)</p> <p>N(0)</p>

Contracting Process

Once an applicant’s application is approved, the process of agreement execution can begin. The contract will define the roles and responsibilities of the entity, which include the following:

- Designating specific staff to administer the funds;
- Receiving pre-approval for proposed expenditures over \$50;
- Submit Client Report Forms for each client served;
- Submit Monthly Invoices;

- Submit Quarterly Reports;
- Submit a Final Report

As part of the application process, the applicant will submit an overview of the process of working with clients and disbursing payments. This will be included as an attachment to each entity's agreement.

The contract will be a **reimbursement-based contract**, so entities will be responsible for the initial expenditures and can then submit the expenditures, with appropriate back-up for reimbursement.

Each entity will be eligible for an initial contract of \$10,000. Entities must expend at least 25% of their initial allocated funds by December 31, 2023, and 75% of their initial allocated funds by March 31, 2024. The SGVCOG reserves the right to unencumber any funds in excess of those amounts that haven't been expended by those dates.

Entities will be able to request additional funds after the initial funds have been expended, pending funding availability. **Should additional funding be allocated to an entity, the SGVCOG reserves the right to unencumber funds that are not being spent in a timely manner.**

An entity will not be reimbursed for any expenditures that occur prior to execution of an agreement with the SGVCOG.

Reimbursement Process

As indicated above, entities will be reimbursed for all eligible expenditures - meaning those expenditures that are both eligible based on the Program Guidelines and disbursed in a manner consistent with the program requirements. Each agency will designate an individual or individuals that are designated and approved to request funding, based on their experience working with clients. Only those individuals will be able to request funding. Each individual must sign a form verifying that they have read and understand the funding guidelines and agree to implement them as written. Individuals should focus on providing the minimum financial intervention necessary to ensure that the client is housed/rehoused/remains housed. Each entity should also focus on ensuring that financial interventions result in long-term housing stability.

It is the responsibility of the entity to ensure that expenditures are eligible. The SGVCOG will not reimburse for ineligible expenditures, including those that are defined as ineligible and those that are not disbursed in a manner consistent with the program requirements.

The step-by-step process for reimbursement can be found below:

1. Designated Implementer works with the client and completes the Client Report Form.
2. Designated Implementer requests pre-approval for any expenditure greater than \$50 if the authorized individual determines that funding is necessary to house or re-house a client and/or keep them housed. Entities must complete this form completely, in order to help the SGVCOG evaluate expenditures. The SGVCOG will respond to each **complete** request within 1 business day and will aim to respond more quickly. Incomplete requests will delay the approval. Entities should consider the pre-approval timeframes when developing plans with clients.

3. Disburse funds. **Funds may not be disbursed to a client directly but must instead be disbursed directly to the entity that requires funds (e.g. landlord; utility).**
4. Compile appropriate back-up (e.g. receipts; paid invoices; deposits) and submit invoice in the required format on a monthly basis, by the 7th day of each month.

Upon receipt of a complete invoice (meaning an invoice that includes all required back-up), the SGVCOG will aim to reimburse the entity within 30 days.

With each submitted invoice, the entity must also submit the completed Client Report Form for each client, which must include the amount of funds disbursed on behalf of that client and the category of funds. The SGVCOG will compile this information for submission in its Quarterly Report to the County of Los Angeles for compliance with its contract with the County of Los Angeles Homeless Initiative (HI).

Partner Expectations

The SGVCOG will publish an online list of partners that can access the Housing Solutions Fund so that clients can know where resources can be accessed. The SGVCOG will also publish online how clients can access resources from each partner. A partner agency may not withhold services or resources to a client based on their city of origin, any protected status, and must utilize a housing-first, trauma-informed care approach to serving clients.

If a partner does not have sufficient resources to provide adequate case management support to the client, that must be communicated immediately to the SGVCOG so that the SGVCOG can refer the client to another provider.

Implementation

The Housing Solutions Fund provides service providers and cities with access to additional financial resources to support clients that may have specific financial needs that will allow them to be housed, re-housed, or remain housed. Each participating service providers must have a specified process that ensures that the

To access the Housing Solutions Fund, approved individual(s) from approved agencies must ensure that the program is implemented consistently with the required guidelines, as outlined below. **The Housing Solutions Fund should also only be accessed after all of other potential funding resources have been exhausted.** Lists of other available resources can be found at the end of this document.

Administrator

To ensure the success of the Housing Solutions Fund, each service provider must designate the Project Administrator, who will be responsible for program oversight and ensuring that funds are expended consistently with the funding guidelines, as well as completing and submitting monthly invoices and quarterly reports to the SGVCOG for review and approval. This individual must be identified and approved by the SGVCOG and, if he/she/they changes during the term of the Agreement, the SGVCOG must be notified and provide approval of that change. To be approved by the SGVCOG, each individual must do the following:

- Briefly document their experience in providing case management to clients and making funding recommendations OR undertake a training;²
- Submit a signed form acknowledging his/her understanding of the Program Guidelines and committing to implementing those Program Guidelines to the best of their ability.

Designated Implementers

To ensure the success of the Housing Solutions Fund, each service provider must designate the individual or individuals that will be responsible for working with clients and making funding recommendations through the Housing Solutions Fund. **Since funding is limited and the allocation of funding must be approved by the SGVCOG, it is imperative that the Designated Implementer can appropriately evaluate the required amount of assistance that will provide a feasible outcome for clients and their housing and be able to communicate that information to the clients.**

Only individuals who have been designated by the service provider and who have been approved by the SGVCOG will be authorized to make funding recommendations for clients and submit funding pre-approval requests. To be approved by the SGVCOG, each individual must do the following:

- Briefly document their experience in providing case management to clients and making funding recommendations OR undertake a training;³
- Submit a signed form acknowledging his/her understanding of the Program Guidelines and committing to implementing those Program Guidelines to the best of their ability.

A service provider may designate as many individuals as they'd like, at any point during program implementation. **However, an individual must be approved by the SGVCOG prior to making any funding recommendations for clients and submitting pre-approval requests. Any funding request or reimbursement request submitted by an individual that hasn't been approved by the SGVCOG will be denied.**

Case Management

Each service provider is expected to provide some level of case management to their clients. Each service provider must have a conversation with the client to determine what interventions - financial or otherwise – would be the most impactful in helping the client move into and retain long-term housing. This includes having a plan to ensure the longer-term housing stability of that client, even after the financial intervention. Under no circumstances should a service provider provide financial assistance to a client that will not be able to retain housing beyond the financial intervention. Each service provider should also ensure that their clients are accessing all mainstream resources and services for which they're eligible, which could include Social Security, MediCal, General Relief, CalFresh, and workforce development resources. It is crucial that Implementers also utilize Coordinated Entry System (CES) resources to maximize the support provided to clients.

² This requirement may be waived for individuals that work for agencies with significant experience managing similar types of programs, provided that there is an approved individual overseeing the program as a whole.

³ This requirement may be waived for individuals that work for agencies with significant experience managing similar types of programs, provided that there is an approved individual overseeing the program as a whole.

To the extent possible, all clients should also be entered into the County's Homeless Management Information System (HMIS) to ensure that clients are able to access broader County resources.

Program Categories

There are 2 program categories that are accessible to service providers, each of which has slightly different implementation requirements:

1. Housing/Re-Housing
2. Prevention

A single client/family may not exceed the following thresholds on an annual basis:

- **Individual: \$2,500 per year**
- **Family: \$5,000 per year**

An individual and a family must meet the following definition and must be screened to be eligible for assistance:

- **Individual**
 - A household consisting of a single-person; OR
 - A group of unrelated people sharing a housing unit such as partners or roomers; OR
 - A household that does not consist of minor children (17 or under)
- **Family**
 - Households consisting of one or more minor children (17 or under) in the legal custody of one or two adults who are living together and working cooperatively to care for the children. This includes 2-parent and 1-parent families, including those with same sex partners; OR
 - Families with intergenerational or extended family members, unmarried couples with children, families that contain adults who are not the biological parents of the children, and other family configurations; OR
 - Households currently without minor children, in which the mother is in her last trimester of pregnancy, or mothers who have been medically diagnosed as having a high-risk pregnancy.

Housing/Re-Housing

This program is focused on providing targeted resources for eligible clients to help them move into permanent housing. Each service provider should provide case management to eligible clients to determine the intervention - financial or otherwise - that will help move them into permanent housing that they can retain. Specifically, a client must be able to independently afford the housing to which they're referred - whether with a housing voucher or have adequate income to cover the cost of the rent/expected expenses.

Each service provider shall focus on connecting clients to interventions that are sustainable by the client beyond the financial intervention.

Clients Eligibility

Clients must meet at least one of the following criteria to be eligible for housing/re-housing assistance.

- 1) [Clients must be homeless, meeting at least one of the following criteria:](#)

- a) Has a primary residence that is a public or private space not meant for human habitation;
 - b) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (e.g. congregate shelters; transitional housing; hotels/motels paid for by charitable organizations, or by federal, state, or local government programs)
 - c) Is exiting an institution where s(he) has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- 2) At Imminent Risk of Homelessness, meeting the following criteria:
- a) Residence will be lost within 30 days of the date of application for homeless assistance;
 - b) No subsequent residence has been identified;
 - c) The individual or family lacks the resources or support networks needed to obtain other permanent housing.
- 3) For unaccompanied youth under age 25 or families or families with dependent children, meeting at least one of the following criteria:
- a) Meets the criteria in section 1
 - b) Have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application
 - c) Have experienced persistent instability as measured by two moves or more during the preceding 60 days
 - d) Can be expected to continue in such status for an extended period of time due to special needs or barriers
- 4) Any individual or family who
- a) Is fleeing, or is attempting to flee, domestic violence
 - b) Has no other residence, and
 - c) Lacks the resources or support networks to obtain other permanent housing

Implementers may not discriminate or withhold resources or services from a client on the basis of race, color, sex, sexual orientation, age, religious belief, national origin, marital status, physical or mental handicap, medical condition, or place of residence (including jurisdiction of residence). The SGVCOG reserves the right to disencumber funds if an implementer is withholding services or resources on any of these bases.

Expenditure Examples

General categories of eligible expenditures and examples of when those might be used are found below, subject to the limits found in later sections:

Intervention	Types of Eligible Expenditures (subject to limits defined below)
Family Reunification	Transportation; Short-term Motel/Hotel Voucher; Host Household Assistance
Move-in Support for Client ⁴	Documentation; Application Fees; Transportation (to unit viewings, etc.); Security Deposit & First Month's Rent (if not available

⁴ Must have housing voucher or other verified way of paying ongoing rent

	through other sources); Furniture
Interim Housing Move-in	Transportation; Short-term Motel/Hotel Voucher

Prevention

This program is focused on providing targeted resources for eligible clients to prevent them from falling into homelessness. These resources should be utilized in connection with a problem solving conversation with each client to determine the specific financial intervention that will allow them to **retain their housing**. Specifically, problem solving empowers households facing a housing crisis to identify safe and appropriate housing options, with the support of trained staff.

It is important to note that this funding is only for housing retention and cannot be used for other financial needs that clients might have that are not necessary for the client to retain their housing. A key component of this problem solving conversation is ensuring that clients are still able to retain their housing **after** the financial intervention. If a client is consistently unable to afford their housing, the problem solving conversations/financial resources should focus on moving the client into a housing situation that is financially sustainable for them.

Client Eligibility

Clients must meet at least one of the following criteria to be eligible for prevention assistance:

- 1) [Clients must be homeless, meeting at least one of the following criteria:](#)
 - a) Has a primary residence that is a public or private space not meant for human habitation;
 - b) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (e.g. congregate shelters; transitional housing; hotels/motels paid for by charitable organizations, or by federal, state, or local government programs)
 - c) Is exiting an institution where s(he) has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- 2) [At Imminent Risk of Homelessness, meeting the following criteria:](#)
 - a) Residence will be lost within 30 days of the date of application for homeless assistance;
 - b) No subsequent residence has been identified;
 - c) The individual or family lacks the resources or support networks needed to obtain other permanent housing.
- 3) [For unaccompanied youth under age 25 or families or families with dependent children, meeting at least one of the following criteria:](#)
 - a) Meets the criteria in section 1
 - b) Have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application
 - c) Have experienced persistent instability as measured by two moves or more during the preceding 60 days
 - d) Can be expected to continue in such status for an extended period of time due to special needs or barriers
- 4) [Any individual or family who](#)

- a) Is fleeing, or is attempting to flee, domestic violence
- b) Has no other residence, and
- c) Lacks the resources or support networks to obtain other permanent housing

AND

- 5) Must be at or below 80% Area Median Income (AMI) for Los Angeles County.

AND

- 6) Must have experienced an event that resulted in their housing crisis, including but not limited to the following:
 - a) Job Loss;
 - b) Death/Illness; or
 - c) Rent increase, in a situation in which the landlord has legally increased the rent.⁵

Implementers may not discriminate or withhold resources or services from a client on the basis of race, color, sex, sexual orientation, age, religious belief, national origin, marital status, physical or mental handicap, medical condition, or place of residence (including jurisdiction of residence). The SGVCOG reserves the right to disencumber funds if an implementer is withholding services or resources on any of these bases.

Problem Solving Conversations

If a service provider is interested in accessing prevention funds for a client, he/she/they must begin with a problem conversation that is designed to identify the strengths, existing supports, and needs of a household in order to identify creative solutions to resolve their housing crisis. It is critical that the service provider uses active listening to allow the household to share their story without interruption and with the approach that they feel heard, ensuring that the conversation is client-centered. Implementers should use active listening and motivational interviewing focused on learning about the client's housing history, potential support networks, current and past income, and safety and appropriateness of housing. The five main outcomes that can be achieved through problem solving are as follows:

1. Permanently moving in with family or friends;
2. Returning to their own residence;
3. Temporarily moving in with family and friends as they seek new housing;
4. Relocating permanently to a safe location out of town where they have social supports of friends or family;
5. Finding a new residence of their own.

The Los Angeles Homeless Services Authority (LAHSA) has a guide for implementation and best practices for problem solving, which all implementers should read and can be found [here](#). The guide outlines the key elements of a problem solving conversation:

1. Create a comfortable, safe meeting environment.
2. Have a conversation to learn about the client, not just a checklist of questions.
3. Be clear and transparent about the resource limitations, with a firm commitment to helping the household find a solution.
4. Listen without judgment.
5. Use active listening skills.

⁵ If a landlord has increased the rent for a client, the implementer should first refer the client to legal services to ensure that the landlord followed all laws in increasing the rent.

6. Normalize their experience.
7. Display open, responsive body language as appropriate and be culturally sensitive.
8. Explore strengths and resources.

Problem solving is about having a meaningful conversation with a client to determine how to prevent them from falling into homelessness. Problem solving is not rental assistance, although rental assistance may be a component of a problem solving conversation. There are not sufficient funds to provide ongoing rental assistance for an individual or family, therefore it is crucial that the Implementer provide support that will ensure that the client remains housed even after any financial intervention ends. To that end, each client is required to have a housing stabilization plan. The plan must demonstrate that the Implementer has done their due-diligence to ensure that the client will remain housed after the intervention.

It's also critical to note that there are many programs countywide that may be beneficial for problem-solving clients. For example, LAHSA also has problem solving funding that can be accessed if the appropriate training is completed. Implementers should rely not only on in-house resources but also on referrals to other providers in the coordinated entry system (CES).

Exhibit A: Eligible Expenditures and Expenditure Limits

The following table lists the eligible expenditures and expenditure limits per program along with ineligible program expenditures.

<u>Program 1: Housing/Rehousing</u>	
<u>Expenditure</u>	<u>Limits</u>
Documentation (e.g. drivers license, social security card, birth certificate)	<ul style="list-style-type: none"> • Subject to pre-approval requirements
Transportation	<ul style="list-style-type: none"> • Subject to pre-approval requirements
Security Deposit	<ul style="list-style-type: none"> • Up to 2 months rent, based on Small Area Fair Market Rent (FMR) (by Zip Code) • Client must have housing voucher or documented ability to pay rent
First Month's Rent	<ul style="list-style-type: none"> • Up to HUD's Small Area Fair Market Rent (FMR) (by Zip Code) • Client must have housing voucher or have documented ability to pay rent (e.g. pay stubs)
Furniture	Up to \$1000 for individuals/\$1800 for families, subject to pre-approval requirements
Motel/Hotel Vouchers	<ul style="list-style-type: none"> • No more than 3 nights⁶ • Up to \$129 per night. <u>Should a night stay be rated higher than the allowable threshold (e.g. holiday weekend), the SGVCOG will evaluate the request for funds on a case-by-case basis and determine its approval.</u> • Must provide written documentation that it was the best rate available⁷ • Motel/hotel voucher must serve as temporary housing option before moving into a secured permanent housing option (e.g. family reunification; interim housing setting; permanent housing)
Misc. Expenditures	Any expenditures that <u>support a client's move into permanent housing</u> , subject to pre-approval requirements
<u>Program 2: Prevention</u>	

⁶ May request additional nights but must have justification

⁷ Waived if the City has an agreement with a motel/hotel partner

Documentation (e.g. drivers license, social security card, birth certificate)	Subject to pre-approval requirements
Transportation	<ul style="list-style-type: none"> • Subject to pre-approval requirements • Should ensure that client is signed-up for all relevant assistance programs
Security Deposit	<ul style="list-style-type: none"> • Up to 2 months rent, based on Small Area Fair Market Rent (FMR) (by Zip Code) • Client must have housing voucher or documented ability to pay rent
Rental Assistance	<ul style="list-style-type: none"> • Up to HUD's Small Area Fair Market Rent (FMR) (by Zip Code) • Client must have housing voucher or have documented ability to pay rent
Rental Arrears	<ul style="list-style-type: none"> • Must be necessary to prevent loss of housing • Maximum of 1 month rental arrears, up to HUD's Small Area Fair Market Rent (FMR) (by Zip Code)
Host Household Assistance	<p>Must be for costs associated with the client staying at the home (e.g. utilities; food; etc.) and service provider⁸</p> <ul style="list-style-type: none"> • Maximum assistance for 30 day stay: \$200 for individual; \$450 for family with children • Maximum assistance for 60-day stay: \$400 for individual; \$900 for family with children
Other Expenditures	Any expenditures that ensure that a client will not lose housing, subject to pre-approval requirements. <u>The implementer must demonstrate the direct linkage as to how the expenditure would prevent homelessness.</u>

Ineligible Expenditures

- Food;
- Alcohol;
- Staff Time;
- Utilities⁹;
- Expenditures that have not been pre approved through the designated process;
- Expenditures that exceed the limits listed above; or
- Reimbursements for city programs (e.g. recreation classes; transportation programs)

⁸ Host household must commit to a minimum stay of at least 30 days

⁹ Utility companies have existing programs designed to help residents avoid utility shut-off. Implementer should instead direct the client to those programs.