

**Ryan White Part B and Life Care Services
Housing Policy**

Definition

The intent of the Ryan White Part B Housing Program is to assist clients with locating, paying for, and maintaining safe and affordable housing. Housing services provide transitional or short-term housing assistance to enable a client or client and their family to enter or remain in HIV care or treatment and achieve positive medical outcomes. This includes temporary assistance necessary to prevent homelessness and to gain or maintain access to medical care.

Eligibility

The client's eligibility for Ryan White Part B services must be determined or be in the process of being determined before housing services are initiated. Client eligibility for Ryan White services must be documented in the client's files. Ryan White Part B National Monitoring Standards require that client eligibility be reassessed every six months.

Provider of Last Resort

Ryan White services are intended as services provided as a last resort. Subrecipient organizations must make reasonable efforts to secure non-Ryan White housing funds for clients whenever possible. It is understood that housing funds are scarce, programs often have stringent requirements that exclude people needing housing assistance, and the need for housing assistance can emerge quickly. Therefore, while subrecipient organizations must make reasonable efforts to secure other sources of housing assistance, clients and/or subrecipient organizations are not required to document that they have exhausted all other sources of housing assistance before receiving assistance from the Ryan White housing program.

Required Documentation

Clients who receive assistance under the Housing category must have a documented individualized housing plan, updated annually, to guide the client's linkage to permanent housing. If the client has a clinical case manager, community case manager, or linkage to care specialist, this housing plan must be created in partnership with the client's case manager, or linkage to care specialist. The creator of the housing plan can note that they discussed the plan with the case manager or linkage to care specialist in a progress note or on the housing plan itself, along with the date the conversation occurred.

The subrecipient agency must have mechanisms in place to assess and document the housing status and housing service needs of new clients and at least annually for existing clients. The subrecipient organization must document in the client's records what assistance was provided to the client to help them obtain stable long-term housing.

Subrecipient organizations must keep documentation of the number of clients served. The subrecipient organization must also document the following information for each client who receives housing services: eligibility for Ryan White services, the duration of housing services, type of housing provided, amount of financial assistance provided if applicable, and housing referral services provided.

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Subrecipient organizations must send the State HIV Program monthly updates on the number of clients receiving assistance that month, the number of clients on any waitlist for service, and the total amount of rental assistance spent during the month.

Allowable Costs

The following costs are allowable uses of Ryan White Part B housing services funds:

- Rent payments (excluding security deposits) for housing. It is not required that the housing provide core medical and/or support services, but rent payments for housing that does provide these services are allowable.
- Fees associated with housing referral services including assessment, search, placement, and housing advocacy services on behalf of the eligible client.
- Costs associated with housing case management or housing specialist staff, including salary, fringe, supplies, travel and training, agency costs, and associated administrative or indirect costs.
- Costs associated with staffing and/or operating a transitional residence that houses PLWH.

Unallowable Costs

The following costs are not allowed as a use of Ryan White housing funds:

- Direct cash payments to clients
- Mortgage payments
- Security or rental deposits
- One-time assistance with paying rent. This cost falls under the category of emergency financial assistance.

Subrecipient Requirements

Subrecipients funded with Ryan White Part B Housing funds are expected to use a Housing First model. The U.S. Department of Housing and Urban Development (HUD) defines housing first as “an approach to quickly, and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.”¹ Housing First is based on the theory that client choice is valuable in housing selection and supportive service participation, and that exercising that choice is likely to make a client more successful in remaining housed and improving their life.²

Programs are expected to operate on the following principles:

- People experiencing homelessness or unstable housing have the right to self-determination and should be treated with dignity and respect.

¹ U.S. Department of Housing and Urban Development. “Housing First in Permanent Supportive Housing.” <https://files.hudexchange.info/resources/documents/Housing-First-Permanent-Supportive-Housing-Brief.pdf>

² National Alliance to End Homelessness. “Housing First.” <https://endhomelessness.org/resource/housing-first/>

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- Clients are eligible for housing assistance regardless of the subrecipient organization(s) from which they do or do not receive services.

Subrecipient housing programs are subject to the following requirements:

- Subrecipient organizations cannot require Ryan White clients to repay housing assistance to the subrecipient organization or to pay for housing navigation services. Programs can require that clients pay a portion of their income towards rent, not to exceed 30 percent of the client's gross income.
- Subrecipient organizations cannot add nuisance ordinances or clauses to a client's living conditions beyond those put in place by the rental or lease agreement.
- Subrecipient organizations cannot require clients to undergo treatment or medical procedures or to have medical tests as a condition of receiving housing assistance.
- Subrecipient organizations cannot use a client's viral load, CD4 counts, or any medical information beyond the client's HIV status to determine whether the client is eligible for assistance.
- Subrecipient organizations cannot require clients to participate in employment or vocational training, medical or non-medical case management services other than housing case management provided by housing program staff, or other social services as a condition of receiving assistance. Offering to refer clients to these services and making these services available to clients is acceptable and encouraged.
- If an organization requires housing assistance clients to complete formal check-ins or appointments with housing staff, clients cannot be warned, taken off a waitlist for housing, or removed from the program for failing to complete check-ins that occur more frequently than once a month. This does not apply to all communication between housing staff and clients, only to formal check-ins. The subrecipient organization can contact the client more frequently if warranted, but the client cannot be punished for non-compliance or non-response if check-ins or contacts occur more frequently than once per month.

When clients are enrolled in the subrecipient organization's housing program, they must be presented with a written copy of all rules that they will be expected to follow to remain in the program, including the procedure for being removed from the program and the conditions under which they may be removed from the program.

If a subrecipient organization contracts with another agency to provide housing services, the contracted agency is expected to meet the same requirements as if it were a subrecipient organization.

Expectations of Housing Staff at Subrecipient Organizations

Housing referral services must be provided by case managers or other professionals who possess a comprehensive knowledge of local, state, and federal housing programs and know how these programs can be accessed. Expectations for housing case managers or other professionals funded by Ryan White housing funds include:

- Prompt response to client contacts within seven (7) calendar days of contact.
- Working one-on-one with clients to:
 - Increase housing literacy

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- Provide education on topics that include what to look for in a lease, what is an affordable rent for a specified income, how to be a good tenant and neighbor, and how to assess potential housing units for safety and habitability.
- Offer to link clients to other Ryan White and community services at the time of application and/or while the client is enrolled in the housing program
- Actively assisting clients with housing searches by identifying potential units and contacting property managers
- Visiting potential housing units with clients
- Offering assistance with employment resources and supporting clients who are referred to these services as the clients work to address income instability.
- Working in partnership with the client's case manager or linkage to care specialist, if the client has one. Any housing plans developed by housing staff must be developed in consultation with, communicated to, and agreed to by the client's case manager or linkage to care specialist, regardless of the organization at which the case manager or linkage to care specialist is located. Communication and agreement with the case manager or linkage to care specialist can be documented as a housing case manager's note in the client's housing records that describes the outcome of the correspondence and includes the date of the correspondence.

Procedure for Removing Clients from Housing Programs for Vacating Units Without Notice

If a client vacates a rental unit without informing the subrecipient organization, the subrecipient organization can stop payments on the rental unit after the following steps:

1. Attempting to contact the client through any available means that are allowable by agency policy, including phone, text, social media, and collaboration with the client's case manager or linkage to care specialist, if the client has one.
2. Completing a home visit to verify that the client is no longer in the unit.
3. Informing the client's case manager or linkage to care specialist (if the client has one) that the client has vacated the unit.

Clients must be informed upon entering the housing assistance program that vacating their unit without notice will result in removal from the program.

Procedure for Removing Clients from Housing Programs for Behavior or Violation of Policies

Removing clients from housing programs for behavioral reasons or for violation of housing program policies should be used as a last resort. Clients cannot be removed from housing programs for missing appointments or being out of medical care. Any process for removing a client from a housing assistance program must meet the requirements below.

Prior to disenrolling a client, subrecipient organizations must:

Give the Client a Warning:

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1. Document that the client has a clear pattern of violation of housing program policies.
2. Give the client notice that if they do not change this behavior, they may be removed from the program. This notice must be given verbally either in person or through a real-time phone conversation and offered in writing, and include specific information on what behavior the client is expected to change. If the client refuses written documentation of the notice, subrecipient organizations should document this.
3. Inform the client's case manager either over the phone or in person that the client is in danger of losing their housing assistance. This cannot be done through an email or voicemail – the subrecipient organization must speak directly to the client's case manager. If the client does not have a case manager, the subrecipient organization must attempt to ensure that the client is linked to a medical case manager or linkage to care specialist at this point.
4. The subrecipient organization must inform the State HIV Program that a client is in danger of being disenrolled and summarize the reason for the decision to disenroll the client.
5. If the pattern of behavior continues, the subrecipient organization must continue to document this information. After issuing this warning, the subrecipient organization must wait at least 30 days before proceeding to giving the client 30 days' notice as described below.

Give the Client 30 Days' Notice:

6. If the subrecipient organization decides that the client will be removed from the program, the subrecipient organization must inform the client that their housing assistance will end 30 days from the date the client is informed. The subrecipient organization must inform the client through a face-to-face meeting or a real-time phone conversation and give the client a written document explaining they will be removed from the program.
7. Inform the client's case manager either over the phone or in person that the client's housing assistance will be discontinued in 30 days. This cannot be done through an email or voicemail – the subrecipient organization must speak directly to the client's case manager.
8. The subrecipient organization must inform the State HIV Program that the client is being disenrolled and summarize the reason for the decision to disenroll the client, including written confirmation from the client's case manager that the case manager received this information.

Exceptions to this policy will be considered by the State HIV Program in extreme circumstances only if the subrecipient organization proves that the client is a danger to self or others.

Sources: PCN 16-02, Housing Frequently Asked Questions for PCN 16-02

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Appendix A: Form for Reporting the Warning or Removal of a Client from Housing Programs for Behavior or Violation of Policies

This optional form can be used to inform Wisconsin HIV Program staff that a housing program client received a warning about behavior or violation of program policies or that a client has been given notice that their housing assistance will end in 30 days.

Subrecipient organizations receiving housing funding from the Wisconsin HIV Program are not required to use this form, but must report this information to Wisconsin HIV Program staff using either this form or using another method.

Information regarding the warning or removal of a client from housing programs should be securely faxed to 608-266-1288 **or** sent via encrypted, secured email to the HIV Care Supervisor (AmyR.Wick@dhs.wisconsin.gov) and the Ryan White Coordinator (ElizabethR.Miller@dhs.wisconsin.gov) within 3 business days of issuing the warning or notice of removal from the program.

Reason for form submission:

- Client received warning that if behavior does not change, they may be removed from the program
- Client has been informed their housing assistance will end in 30 days

Name of Client:

What specific behavior has resulted in the client being warned/ removed from the program?

How many times or for how long has this behavior occurred?

How was the warning or removal communicated to the client?

Does the client have a case manager or linkage to care specialist? If so, when and how were they informed that the client has been warned/ will be removed from the program?

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Appendix B: Ryan White Part B Monthly Housing Reporting Form

This optional form can be used to submit monthly housing assistance reports to the Wisconsin HIV Program.

Subrecipient organizations receiving housing funding from the Wisconsin HIV Program are not required to use this form, but must report this information to Wisconsin HIV Program staff using either this form or using another method.

The monthly housing report should be sent to the Ryan White Program Coordinator (ElizabethR.Miller@dhs.wisconsin.gov) within 30 days after the end of the reporting month.

Agency:

Name of person completing report:

Email and phone number of person completing report:

Reporting Month:

Date submitted:

Number of clients who received rent assistance during the reporting month:	
Number of clients on a waitlist as of the last day of the reporting month:	
Total amount (\$) spent paying client rent or housing costs during the reporting month <i>(Does NOT include staff/personnel costs, supplies, or administrative costs of running the program)</i>	

Please send reports to the Ryan White Program Coordinator (ElizabethR.Miller@dhs.wisconsin.gov) by 30 days after the end of the reporting month.