District of Columbia
Interagency Council on Homelessness

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Housing Solutions Committee
April 4, 2018

Meeting Agenda

I. Emergency Rental Assistance Program – Proposed Changes

II. Review of Workflow for Project-Based PSH Units

III. FY19 Budget Proposal

IV. DHCD Updates

DC Department of Human Services

# ERAP Regulations – Proposed Enhancements

April 4, 2018

Overview/Background

- DHS is proposing changes to The Emergency Rental Assistance Program (ERAP) to provide more targeted and sustainable support to households at risk of homelessness.
- Guiding principles for this effort include
  - Continue to use ERAP to support families with one-time housing emergency;
  - Re-direct families who experience repeat visits to deeper interventions that match deeper need;
  - Continue to serve same total number of families;
  - Invest in programs that provide the best cost-to-outcome ratio; and
  - Be proactive with communications to clients and stakeholders.
- Additionally, we want to prioritize resources for those who do not receive other housing assistance supports.

Process to date

- In Spring 2017, DHS engaged advocates, providers and other stakeholders to discuss concerns and opportunities with ERAP including updating the regulations.

- DHS took that feedback to craft recommended changes and clarifications to the ERAP regulations to more effectively serve District residents' need.

- Later this year, DHS to submit draft regulations for community review.

- Goal: implement revised regulations at the beginning of FY19.

ERAP Repeat Clients (FY11-16)
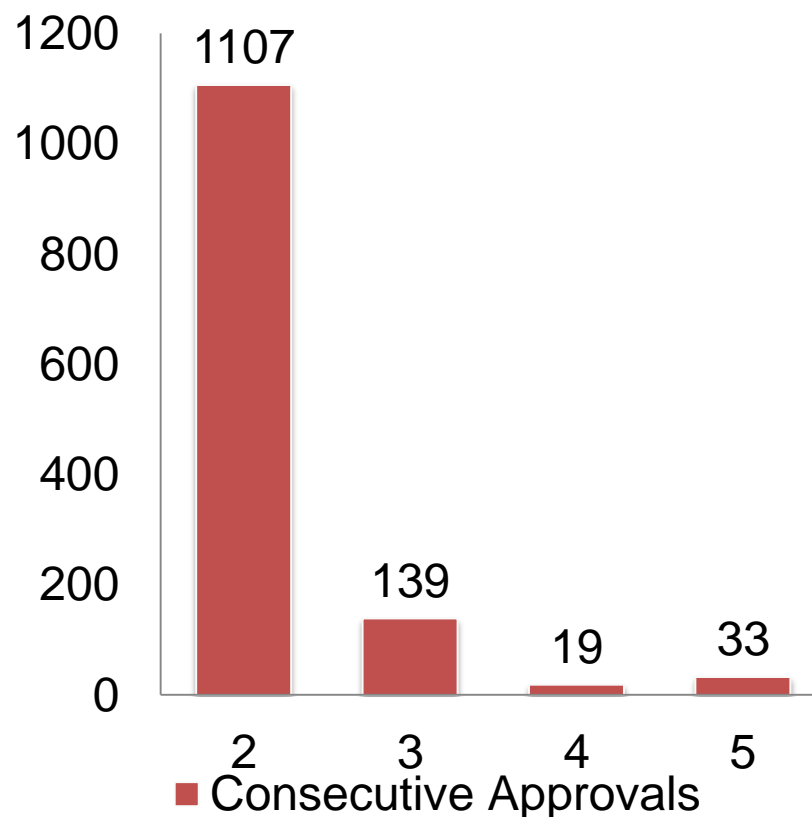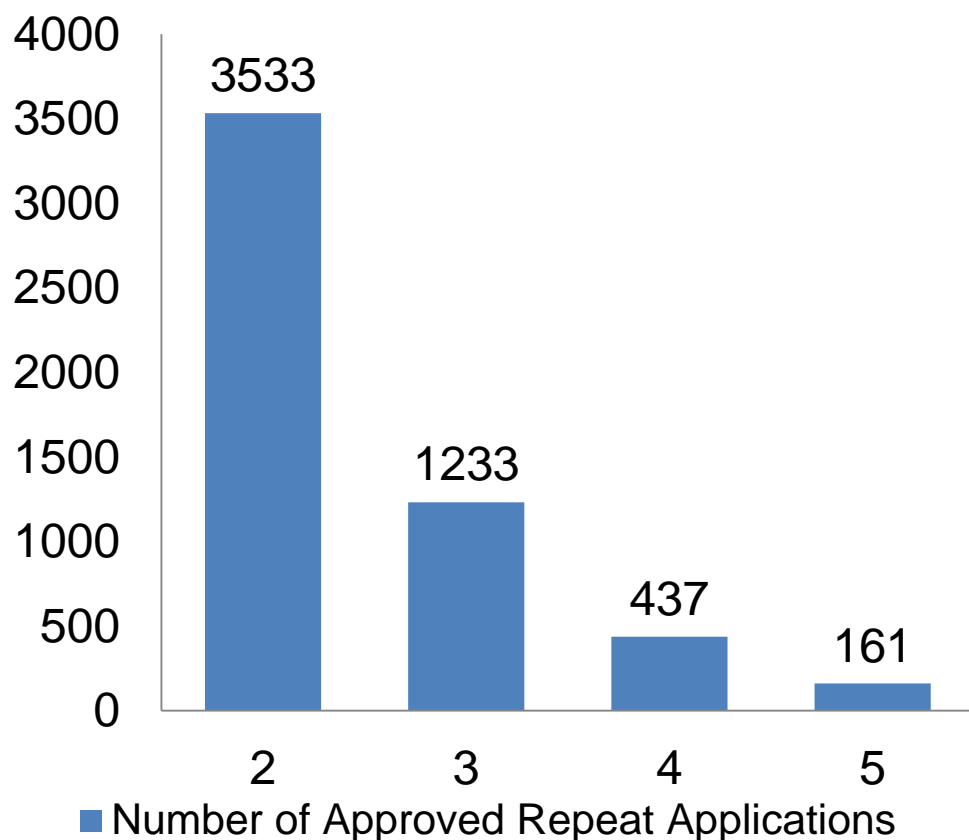
Take-away: high demand for repeat applications suggests subset of families may benefit from additional stabilization services.

ERAP and DCHA Data Match (FY11-16)

FY11-16	DHS ERAP Clients	DCHA Clients	%
Total Applications	24,990	4,751	19%
Total Approved Applications	15,731	3,922	25%
Total Budget	$ 48,201,000	$7,700,998	15%

Take-away: One forth of ERAP clients are DCHA clients – depending on nature of emergency, many may be better served through recertification, access to repayment plans, and/or money management and budgeting services.

Cost Comparison:
ERAP vs. Homeless Prevention Program (HPP)

FY16	ERAP	HPP
Total budget	$9,786,000	$1,671,667
Total clients served	2485 approved applications	2225
Average cost (budget/client)	$3938	$751
Average direct client cost for lease holders (subtracting admin costs, including case management)	$3024	$557

Proposed Regulations Changes and Enhancements

Application period: Implement a 45-Day application period.

Current Regulation	Proposed Change	Impact of Change
(Section 7501.15) Currently, the regulations allow the client to have 60 days to complete the application process. Furthermore, clients should also have a limit of 10 business days to return documentation to the provider **(Section 7501.8)**	**Change the application period to 45 Days.** • If it is indeed an emergency, they should be required to do it in fewer than 60 days. • It will allow providers to provide assistance in a timely manner and address clients who are most at-risk.	• The positive impact is that we can assess if it truly is an emergency because the timing to secure all documentation will be shortened. • The potential negative impact is that Providers also take a look at the next 30 days of income if someone doesn't meet income requirements at the time of application. • If they recently lost a job and are bringing the last paystub, it won't reflect the decrease in total income at the time of the application. • However, we can look at these customer's on a case by case basis. There is also the opportunity to close and reopen a case after the expiration of the application period.

Proposed Regulations Changes and Enhancements

DCHA Customers

Current Regulation	Proposed Change	Impact of Change
No Current regulation limiting assistance to DCHA subsidy recipients	DHS should include language in the regulations that prohibit customers who receive housing subsidies or are living in subsidized housing from receiving ERAP for any rental amount that exceeds the total of three months of their rental payment amount.	• Ensure that any regulatory change that prohibits a customer who receives a subsidy from obtaining ERAP doesn't violate fair housing laws or regulations. • The potential financial impact is approximately $500K per year that could go to other households who do not receive housing subsidies. (see chart below)

Fiscal Year	Total ERAP Funding provided to DCHA (not including private DCHA/HCVP voucher holders)	Total ERAP Budget	Percent of Total ERAP Budget
2015	$505,758.54	$9,286,000	5.4%
2016	$527,425	$9,786,000	5.4%
2017	$462,248	$8,831,386	5.2%
TOTAL	$1,495,431	$27,903,386	5.35%
FY2018 (as of 3/23/2018)	$171,133	$7,347,051	

NOTE: This only include public housing customers where the check is going directly to DCHA.

ERAP and Case Management

- Currently, to be eligible for funding clients must be offered case management but don't need to accept it.
- DHS is interested in referring clients who return within 24 months to HPP.
- Pilot Program:
  - Beginning in November 2017, ERAP piloted a process whereby we refer clients to HPP who are seeking ERAP services within 24 months of their previous application.
  - ERAP provider submits a referral and the HPP provider contacts the client to meet. The ERAP provider would pay the arrears once the client had met with the HPP provider.
  - As of 3/30/18, 106 customers were referred to HPP from ERAP
  - Will monitor these clients to determine if there is any further engagement with
- DHS will assess pilot after 12 months of the current referrals.

Additional Minor Changes

- DHS is also planning to tweak language around the following topics:
    - More inclusive definition of Familial Status
    - Easier ability to combat fraudulent documentation
    - Applying income tax refunds to outstanding balances

Anticipated Timeline

FY19 Regulations Changes	DATE
Request suggested changes from Stakeholders	06/15/17
Solicit Feedback on changes from DHS and Stakeholders	7/20/17
Incorporate proposed changes into the regulations	Fall 2017 / Winter 2018
DHS finalizes proposed regulations	April / May 2018
Regulations submitted for Community Review Process	Summer 2018
Final Review and Publish	FY19

Questions/Suggestions?

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II. **Review of Workflow for Project-Based PSH Units**

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Project-Based PSH Workflow: Discussion Purpose

- ❖ DHCD has worked closely with the ICH to align the Consolidated RFP with the Homeward DC Plan, incorporating requirements related to Housing First and use of the Coordinated Assessment and Housing Placement (CAHP) system.

- ❖ As units have been coming online, there have been a number of lessons learned.

- ❖ A group of ICH stakeholders met in March to map our understanding of the workflow process and identify areas where questions or challenges have emerged.

- ❖ Goal of today's discussion is to review those questions/challenges so partners to the Consolidated RFP can take the information back to their teams and consider what options or remedies may exist.

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