

# Office Hours: Permanent Housing Placement National Challenge to House 38,000 Veterans

VHA Homeless Programs Office – June 24, 2022

## Expediting HUD-VASH Placement to Meet or Exceed the 38,000 Goal

### *Agenda*

- Framing and Background on HUD-VASH
- Program Waivers/Flexibilities Overview
- Addressing Barriers to Voucher Issuance
- Expediting Voucher Lease-up and Other Strategies for Increasing Utilization
- Q&A and Next Steps

## Framing and Background on HUD-VASH

### *About HUD-VASH*

- The HUD-Veterans Affairs Supportive Housing (HUD-VASH) program for homeless Veterans combines the Department of Housing and Urban Development's (HUD) Housing Choice Voucher (HCV) rental assistance with case management and clinical services provided by VA.
- VA provides these services for participating Veterans at VA medical centers (VAMC), community-based outreach clinics (CBOC), through VA contractors, or through other VA designated service providers (DSP).
- Since 2008, Congress has appropriated a total of \$885 million for new HUD-VASH vouchers.
- To date approximately 107,000 HUD-VASH vouchers have been awarded to PHA/VAMC partnerships. VA funds approximately 4500 staff and contractors to provide case management and supportive services to HUD-VASH Veterans.
- Approximately 700 PHAs nationwide administer HUD-VASH vouchers in partnership with their VAMCs.

### *Veteran Identification and Assessment*

- VAMC provider, in partnership with their local coordinated entry systems, conduct initial outreach and Veteran identification for HUD-VASH.
- VA assesses:
  - Homeless status
  - Veteran status
    - Expanded definition includes some Veterans not otherwise eligible for VA health care.
  - Need for permanent supportive housing

- Following enrollment in HUD-VASH case management, Veterans are referred to the Public Housing Authority (PHA) for assessment of PHA eligibility (i.e., income and sex offender status) and voucher issuance.

### *HUD-VASH is a Housing First Program*

- As outlined in the VA and HUD [joint statement on ending Veteran homelessness](#), the VA and HUD will:
  - “Lead with an evidence-based Housing First approach – Evidence and past progress on reducing Veteran homelessness demonstrate a Housing First approach works. Together, our agencies will ensure targeted interventions (such as [HUD-VA Supportive Housing](#), [Supportive Services for Veteran Families](#), and [Grant and Per Diem](#)) help Veterans obtain stable housing as quickly as possible without barriers or preconditions.”

## HUD-VASH Waivers and Flexibilities

- Generally, the HUD-VASH program is administered in accordance with regular HCV and PBV program requirements (24 CFR Section 982 and 983 respectively)
- The 2008 Consolidated Appropriations Act (Public Law 110-161) allows HUD to waive or specify alternative requirements for any provision of any statute or regulation affecting the HCV program in order to effectively deliver and administer HUD-VASH voucher assistance.
- All standard waivers and alternative requirements are established in the HUD-VASH Operating Requirements, which were recently updated and published in the Federal Register September 27, 2021. (linked on resources slide)
- PHAs may also seek individual HUD-VASH waivers through the regular HUD Field Office waiver process. Moving to Work (MTW) PHAs may seek HUD approval to apply their MTW flexibilities to their HUD-VASH program.
- In response to the expiration of waivers implemented under the Coronavirus Aid, Relief, and Economic Security (CARES) Act (PIH 2021-14), HUD subsequently published PIH 2022-9: Streamlined Regulatory Waivers for the Housing Choice Voucher (including Mainstream and Mod Rehab) Program.
  - Published with an aim to streamline requirements and help PHAs with voucher utilization including HUD-VASH.
  - Includes two payment standards waivers which PHAs to ask for two different regulatory waivers related to payment standards
    - The first waiver allows the PHA to conduct an interim review to apply an increase in the payment standard at any time, rather than waiting until the annual reexam. PHAs that have seen increased payment standards from FY 21 to FY 22, may want to strongly consider this so that families and landlords can see the benefit of the increased payment standard sooner.
    - The second waiver allows PHAs to increase the percentage of fair market rent (FMR) from the current maximum of 110% of FMR up to 120% of the FMR.

## Addressing Barriers to Voucher Issuance

### *Barriers to Voucher Issuance*

- PHA Screening Criteria
  - HUD-VASH PHA screening contains only two elements:
    - Income eligibility.
    - Income targeting does not apply.
  - PHAs may serve low-income Veterans (up to 80% AMI).
  - Lifetime sex offender status.
  - Unlike in the regular HCV program, PHAs must not screen for or deny assistance for money owed to the PHA or for criminal or drug activity
- Personal Identification
  - To verify Social Security Numbers (SSN) for homeless veterans and their family members, an original document issued by a federal or state government agency which contains the name of the individual and the SSN of the individual along with other unique identifying information of the individual is acceptable in accordance with 24 CFR 5.216(g).
  - In the case of the homeless veteran, the PHA must accept the Certificate of Release or Discharge from Active Duty (DD-214) or the VA-verified Application for Health Benefits (10-10EZ) as verification of SSN and cannot require the veteran to provide an SSN card.
  - These documents must also be accepted for proof of age purposes in lieu of birth certificates or other PHA-required documentation.

### *HUD-VASH Best Practices*

- Income Eligibility
  - Based on the current policy in place under the existing applicable HCV regulations and the HUD-VASH Operating Requirements- PHAs may serve low-income veterans in the HUD-VASH program (meaning veterans up to 80% of AMI). However, PHAs are not required by HUD to serve low-income veterans. PHAs have discretion to limit HUD-VASH income eligibility to the HCV standard of very-low-income (up to 50% of AMI). However, if a PHA has HUD-VASH vouchers available, expanding local income eligibility to low-income veterans is an option PHAs are encouraged by HUD to consider in order to serve more veterans and improve program utilization.
- Income Verification
  - Utilize the HUD hierarchy of methods (see notice PIH 2018-18)
- PHA use of technology to expedite processes, use of electronic signatures.

## Expediting Voucher Lease-up and Other Strategies for Increasing Utilization

### *Expediting Lease-Up*

- Recommended Strategies to Expedite Lease-up Include:
  - Pre-inspections:

- To expedite the leasing process for tenant-based HUD-VASH, PHAs may pre-inspect available units that veterans may be interested in leasing to maintain a pool of eligible units. If a HUD-VASH family selects a unit that passed a HQS inspection within 45 days of the date of the Request for Tenancy Approval the unit may be approved as long as it meets all other conditions under 24 CFR 982.305.
    - As required by 24 CFR 982.353(e), a PHA is prohibited from directly or indirectly reducing the family's opportunity to select among all available units.
  - Utilizing Remote Video Inspections (RVI)
    - Refer to Notice PIH 2020-31 for additional information on RVI requirements.

### *Addressing Lack of Housing Availability*

- HUD-VASH PBV Development
  - HUD encourages PHAs and VAMCs to consider PBV development to create permanent affordable housing options.
  - There are many potential benefits of PBV for PHAs, veterans, and the community. Here are just a few to consider:
    - PBVs can preserve or increase the supply of affordable housing within the community.
    - PBVs can address specific community housing needs by providing housing with supportive services or housing for certain types of families.
    - PBVs may improve HCV program efficiency.
- Landlord Recruitment
  - Willing landlords are critical to making the HUD-VASH program successful
  - HUD has put out materials on landlord recruitment for HUD-VASH
    - See materials to support recruitment in the resources section of this webinar.
- HUD-VASH Exception Payment Standards
  - To assist HUD-VASH participants in finding affordable housing, especially in competitive markets, HUD has waived 24 CFR 982.503(a)(3) to allow a PHA to establish a HUD-VASH payment standard. Additionally, 982.503(b)(iii) is waived so that PHAs may go up to, but no higher than 120 percent of the published metropolitan area-wide FMRs or Small Area FMRs (based on which FMRs the PHA is applying) specifically for HUD-VASH families.
  - PHAs must still request from HUD a HUD-VASH EPS above 120%.

### *Use of Special Housing Types*

- PHAs must permit HUD-VASH clients to use the following special housing types for tenant-based HUD-VASH assistance, regardless of whether these types are permitted in their administrative plan for other families:
  - Single room occupancy (SRO)
  - Congregate housing
  - Group home
  - Shared housing
  - Cooperative housing

- Regulations for these housing types can be found at 24 CFR part 982, subpart M. In addition, refer to the HCV Guidebook chapter on special housing types.

#### *Other Options for Addressing Utilization*

- Reallocation between PHAs within VAMC catchment area (HUD Notice Pending).
- Recapture of vouchers (HUD Notice Pending).
- Expanding HUD-VASH Case Management/Housing Search Capacity.

#### *Resources*

- [HUD's HUD-VASH Landing Page](#)
- [HUD-VASH Operating Requirements, September 27, 2021](#)
- [Streamlined Regulatory Waivers for the Housing Choice Voucher Program](#)
- [VA Form 10-10EZ](#)
- [HUD-VASH PBV Guidance](#)
- [PIH Landlord Recruitment Materials](#)
- [HCV Guidebook Chapter on Special Housing Types](#)