

Inventory of Rent Subsidy Programs in Montgomery County

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Office of Legislative Oversight Report 2019-4

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OLO Report 2019-4 Inventory of Rent Subsidy Programs in Montgomery County Executive Summary

The County Council asked the Office of Legislative Oversight (OLO) to prepare a report on the rent subsidy programs in Montgomery County and the populations served by these programs. This report inventories 29 rent subsidy programs administered in the County that provide rent subsidies (known as "housing assistance payments") on behalf of households (individuals or families) who would be otherwise unable to obtain or retain permanent housing due to low income and/or a disabling condition. The inventory excludes short-term and emergency housing assistance programs, shelters, transitional housing, group homes, residential treatment programs, and affordable housing programs that do not provide housing assistance payments.

Major Findings

OLO identified four major findings from the preparation of this report.

Finding #1: No fewer than 29 distinct rent subsidy programs are administered in Montgomery County, ranging from large federally-funded programs administered locally by the Housing Opportunities Commission that serve thousands of households to small programs run by local non-profit organizations under contract to the Department of Health and Human Services.

This report presents an inventory of 29 rent subsidy programs administered in Montgomery County. Each program is administered either by the Housing Opportunities Commission (HOC) or by the County Department of Health and Human Services (DHHS). Many DHHS-administered programs are implemented through contracts with non-profit organizations. The largest programs provide subsidies to several thousand households; the smallest programs serve fewer than a dozen clients.

Rent Subsidy Programs in Montgomery County		
HOC-administered	10 programs	
DHHS-administered	19 programs	

Funding sources vary greatly among the programs in the inventory. Federal dollars cover all rent subsidy costs for some programs, such as the Housing Choice Voucher program, the largest rent subsidy program in the County. Other programs are funded entirely by local dollars, in many cases from the County's Housing Initiative Fund. Still other programs receive a combination of Federal and County funding with some also receiving supplemental support from the State of Maryland.

The inventory includes programs with different target populations. Some programs generally serve low-income households. Some programs target population subgroups such as veterans, persons with disabilities, seniors, and the formerly homeless. Some programs solely offer rent assistance while others combine rent subsidies with supportive services.

The amount of the rent subsidy also varies among the programs. Many programs scale the subsidy amount to household income to assure that the tenant pays no more than 30 percent of household income on rent. Other programs offer subsidies at fixed dollar amounts.

Finding #2: Despite many entities working to reduce and prevent homelessness, these organizations have successfully coordinated services and consolidated program data, and they can serve as a model for rent subsidy programs.

The same organizations that offer rent subsidy programs also offer programs to reduce and prevent homelessness. These organizations have developed systems to coordinate their services in the County and to consolidate and compare data across their programs. A partnership of public and private groups in the County has established a Montgomery County Continuum of Care (CoC) that coordinates programs to prevent and reduce homelessness.

The CoC manages a Homeless Management Information System (HMIS), which is a standardized data system to record and analyze client, service, and housing data for individuals and families who are homeless or at risk of homelessness. The CoC uses the HMIS to coordinate the prioritization of residents needing homeless services and to produce an unduplicated count of homeless individuals and families.

The CoC also uses a Coordinated Entry System (CES) to link homeless people with the housing services best suited to their needs. HUD requires use of the CES to standardize assessments and referrals for potential program participants. All participating organizations refer clients using the same decision-making processes, no matter how a client first accesses the system.

The CoC demonstrates that diverse service providers can successfully coordinate program entry, service delivery, and data management.

Finding #3: No common standards govern data management across rent subsidy programs. Different programs maintain different sets of demographic and financial data, and data are not readily available for several rent subsidy programs.

The rent subsidy programs inventoried in this report have no common data collection or management practices. Several programs report client data in the HMIS, but the HMIS is not designed to track fiscal assistance to clients, and data for many programs are stored outside the HMIS.

Many of the DHHS-administered rent subsidy programs collect client data in DHHS's new Enterprise Integrated Case Management (EICM) system. The EICM records client-level demographic and service information and the housing assistance payments for some programs. However, the EICM does not include housing assistance payment information for many programs run by non-profit contractors. The HMIS and the EICM are separate systems with limited ability to merge data.

Demographic and financial data for some programs administered by the County's non-profit contractors are stored solely in files and spreadsheets maintained by DHHS program managers, but this information is dispersed and difficult to consolidate.

Several permanent supportive housing programs are funded by multiple federal, State, County, and non-public sources. At present, the County's budgeting and accounting systems cannot produce reports that consolidate program data across funding sources. As such, DHHS cannot readily retrieve certain program-specific spending data for some permanent supporting housing programs.

Finding #4: While a coordinated entry system exists for the federally-funded homelessness programs, no similar coordinated entry approach exists for the rent subsidy programs.

The County's CoC has established a coordinated entry system (CES) for homelessness reduction and prevention programs. Some rent subsidy programs accept entry wholly or partially through the current CES, while others run outside the CES with separate paths of entry and waiting lists. For example, HOC maintains an online portal for residents to apply for their programs, but the portal does not provide access to DHHS-administered programs.

OLO Recommendations

Based on the findings of this report, OLO presents three recommendations to the County Council.

Recommendation #1: OLO recommends that Council review the inventory of rent subsidy programs in this report to better understand the array of rent subsidies available to County residents and to inform Council policy and budget decision-making.

The OLO inventory of rent subsidy programs is intended to help Councilmembers and the community better understand the array of rent subsidy programs administered in the County. These programs are run by different organizations, target different populations, offer different subsidy amounts, and receive funding from multiple sources. Outside this report, no current compendium of rent subsidy programs in the County is available.

This report consolidates information about 29 distinct programs, enabling the Council to review each program's provisions including: eligibility criteria, income limits, subsidy amounts, and funding sources. The program inventory in this report will allow the Council to compare elements across programs and identify potential gaps in assistance. Information of this sort can be useful when the Council considers affordable housing policies and allocates resources through the budget process.

However, a comprehensive review of the rent subsidy programs-- and whether these programs leave gaps in service -- requires complete demographic and financial data for each program. Basic demographic and financial data are not readily available for several rent subsidy programs.

Recommendation #2: The Council should ask the County Executive to convene an interagency group to plan for an integrated data management system for all rent subsidy programs.

Rent subsidy program data are kept in multiple data management systems. No common data collection practices exist across all programs. As a result, data from these programs cannot be readily collected, compared or evaluated. The absence of a consolidated data repository hinders assessment of how the programs collectively address the changing needs of the County population. Furthermore, the lack of consistent data across all programs hampers the Council's capacity to compare program performance and to make informed decisions on how to allocate limited County resources.

OLO recommends that the Council ask the County Executive to convene an interagency group to plan for an integrated rent subsidy program data management system. Consistent data would better inform all stakeholders about how County funds are spent and where there may be service gaps.

OLO suggests that the first step be planning to identify the necessary changes to business practices, accounting and budgeting guidelines, procurement rules, and information technology needed for an integrated data management system. Such planning should establish guidelines for data collection including common definitions and methods for sorting comparable data across programs.

OLO recommends that the Council ask the County Executive to convene an interagency group to develop a plan and to identify the resources needed to implement it. OLO suggests that the interagency group report back to the Council by December 31, 2019, on its plans to establish an integrated data management system for all rent subsidy (and possible other related) programs.

Recommendation #3: The Council should ask the County Executive to convene an interagency group to develop a coordinated entry system for all rent subsidy programs.

OLO recommends that the Council ask the County Executive to convene an interagency group to develop a coordinated entry system for all rent subsidy programs in the County. Logically, the rent subsidy entry system would share data with the Coordinated Entry System for homelessness programs as well as with HOC's Housing Path online portal. Alternatively, HOC could expand its portal to allow entry into DHHS-administered rent subsidy programs.

Planning a coordinated entry system for rent subsidy programs would require interagency cooperation. OLO suggests that the ICH, in coordination with the County Department of Technology Services, would be a reasonable group to do this. OLO recommends that the interagency group chosen by the County Executive report by December 31, 2019, on the steps needed to coordinate entry across all rent subsidy programs including identification of needed resources and an implementation timeline.

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Chapter 1. Authority, Scope, Organization and Acknowledgements

A. Authority

Council Resolution 18-882, Fiscal Year 2018 Work Program of the Office of Legislative Oversight, adopted July 25, 2017.

B. Scope, Purpose, Organization and Methodology

This report responds to the County Council's request that the Office of Legislative Oversight (OLO) prepare a report to help Councilmembers better understand the rent subsidy programs administered in Montgomery County and the target populations served by each program. The Council asked OLO to review the eligibility rules, subsidy levels, target populations, and other criteria governing publicly-funded rent assistance programs. The Council seeks this information to better understand how the various rent subsidy programs could more effectively complement each other.

This OLO report describes the role of rent subsidy programs within the larger context of government efforts to increase the supply of affordable housing programs. It also provides an inventory of 29 rent subsidy programs administered in Montgomery County that are intended to prevent tenants from paying an excessive portion of household income on rent. The scope of this report includes rent subsidy programs that provide subsidies (known as "housing assistance payments") on behalf of households (individuals or families) who would be otherwise unable to obtain or retain permanent housing due to low income and/or a disabling condition. For most programs, the subsidy is set at a level to assure that households (individuals or families) expend no more than 30 percent of household income on rent.

The inventory, which is presented in Chapter 3, includes the following elements for each program:

- Program name and administering entity;
- Funding source (including federal, state and county funds);
- Household eligibility criteria;
- Income limits on participating households;
- Subsidy amount available to participating households;
- Duration of benefit availability;
- Path of entry into the program;
- Supportive services that may be provided in addition to rental subsidies;
- Limitations (such as prohibitions on combining program benefits);
- Eligible housing; and
- Legal framework (including laws and regulations that may apply to the program).

This report's program inventory excludes short-term and emergency housing assistance programs, as well as shelters, transitional housing, group homes, and residential treatment programs. The inventory also excludes affordable housing programs that do not provide housing assistance payments.

Organization. This report is organized as follows:

Chapter 2. Background Information describes the purpose of rent assistance programs, the role of rent assistance and rent subsidies within the larger context of affordable housing initiatives, and the organizations involved in providing housing assistance payments.

Chapter 3. Rent Subsidy Programs Administered in Montgomery County, provides a program inventory categorized based on the local administering organization.

Chapter 4. Data Management and Availability, data management systems, reporting requirements, and data availability for the rent subsidy programs described in Chapter 3.

Chapter 5. Findings and Recommendations summarizes the major findings of the report and presents recommendations developed by OLO based on the findings.

Chapter 6. Agency Comments, presents comments from the Montgomery County Government's Chief Administrative Officer and the Executive Director of the Housing Opportunities Commission.

Methodology. This project was conducted by OLO staff members Aron Trombka and Victoria (Tori) H. Hall with assistance from Kelli Robinson. Staff OLO gathered information for the report through document reviews, budget and data analysis, and interviews with Executive Branch staff and Housing Opportunity Commission staff.

C. Acknowledgements

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Chapter 2: Background Information

This chapter provides background information about rent subsidy programs including the purpose of these programs, the role of rent subsidies within the larger context of affordable housing initiatives, and the organizations involved in providing housing assistance.

A. Housing Affordability

Housing affordability refers to the cost of housing relative to a household's income and is calculated as the ratio of household income to housing costs. A common financial rule of thumb holds that households should spend no more than 30 percent of income on housing costs. Rent is considered unaffordable when it consumes more than 30 percent of a household's income. Low-income households with housing costs greater than 30 percent of their income are considered housing-cost burdened and are particularly likely to have trouble paying for other necessities. Since 1981, the 30-percent-of-income affordability threshold has been a rent standard for most public rental assistance.¹

Public programs use a variety of methods to directly or indirectly make rent more affordable for low-income residents, such as:

- <u>Public Housing</u>: In public housing, a local public housing authority owns the rental housing and acts as the landlord. Income-eligible residents pay a rent that is below the market rate.
- <u>Incentives to Developers and Landlords</u>: Privately-owned housing complexes may offer rental units at below-market rates to qualifying low-income households in exchange for a tax credit, favorable loan, or other financial incentive from the government.
- <u>Inclusionary Zoning</u>: Inclusionary zoning programs such as the County's Moderately Priced Dwelling Unit (MPDU) program increase the local supply of affordable housing by offering density bonuses to developers in exchange for the production of price/rent controlled units.
- Rent Subsidies: A rent subsidy is direct assistance in which a government pays a portion of a tenant's monthly rent obligation. Most commonly, the tenant's landlord receives the subsidy payment directly from the government. The amount and duration of the rent subsidies vary by program.

Chapter 3 of this report presents an inventory of rent subsidy programs administered in Montgomery County. Rent subsidies are one element of the County's larger homelessness prevention effort, which also includes emergency financial assistance and home energy bill assistance to avert a crisis and prevent the loss of permanent housing. In some programs, rent subsidies are coupled with supportive services such as case management and other behavioral health services.

¹ Who Can Afford to Live in a Home? A look at data from the 2006 American Community Survey by Mary Schwartz and Ellen Wilson, US Census Bureau; retrieved from www.census.gov/housing/census/publications/who-can-afford.pdf.

B. Income Eligibility and Target Populations

Nearly all rent subsidy programs have income eligibility requirements. Area Median Income (AMI) is frequently used to measure both rent affordability and income eligibility for rent assistance. AMI represents the household income for the middle household (or midpoint in the distribution of households) in a geographic area. Each year, the U.S. Department of Housing and Urban Development (HUD) calculates the AMI for metropolitan regions around the country. HUD adjusts the AMI based on family size.

To determine a household's eligibility for housing assistance, a household's income is typically compared to a percentage of AMI, as follows:

- Low-income households earn less than 80 percent of the AMI.
- Very low-income (VLI) households earn less than 50 percent of the AMI.
- Extremely low-income (ELI) households earn less than 30 percent of the AMI.

Montgomery County has one of the highest AMIs in the country.³ As of June 2018, the AMI for a family of four in Montgomery County was \$117,200.⁴ A 2017 Montgomery County Rental Housing Study found that almost 40 percent of the County's renter households earn less than 50 percent of the regional AMI, and half of all renter households in the County are housing cost-burdened.⁵ According to the study:

As the shortage of price-appropriate rental units for households earning below 50% of AMI is greatest, almost all households earning 50% of AMI or less are cost-burdened. Most are severely burdened, spending more than 50% of their annual income on housing. In other terms, a household earning approximately \$50,000 (before taxes) is likely to be spending at least \$25,000 of that income for housing.

Various rent assistance programs target benefits to different types of low-income households, including veterans, the elderly, persons with disabilities, people with HIV/AIDS, people at risk of homelessness, and families with children.

² HUD measures household income using the five-year estimates of the American Community Survey.

³ The Area Median Income (AMI), Explained by Brian McCabe (September 2016), Greater Greater Washington; retrieved from https://ggwash.org/view/42671/the-area-median-income-ami-explained.

⁴ Montgomery Co. Dept. of Housing & Community Affairs – 2017 Rent and Income Limits; retrieved from https://montgomerycountymd.gov/DHCA/Resources/Files/housing/multifamily/compliance/rent_income_limits_current.pdf.

⁵ Montgomery County Rental Housing Study: Report on Recommendations and Tools, June 2017, RKG Associates, Inc. (p. 12), retrieved from http://montgomeryplanning.org/wp-content/uploads/2017/07/RHS Strategy-Document.pdf.

⁶ Montgomery County Rental Housing Study (2017), page 15.

C. Federal and State Housing Assistance

The federal and State Governments fund multiple affordable housing programs that serve low-income individuals and families, including residents of Montgomery County.

1. Federal Government

The federal government funds multiple affordable housing programs that serve low-income residents of Montgomery County. The federal government assists in making rental housing more affordable through mechanisms such as: rent subsidies, tax credits for developers (the Low-Income Housing Tax Credit), block grants to state and local governments, and home mortgage insurance programs.

The United States Department of Housing and Urban Development (HUD) manages most federal housing assistance programs. Federal laws and regulations govern the HUD programs including rules on eligibility requirements, income levels, subsidy amounts, and authorized housing types. Funding for these programs is set through the annual appropriations process; these are not federal entitlement programs. State and local governments and public housing authorities that are awarded federal funds under these programs implement the programs locally. As a condition of receiving federal funds, HUD requires state and/or local administering agencies to report program expenditures and the outcomes achieved through these expenditures.

2. State of Maryland

State of Maryland housing assistance programs primarily focus on: (1) financing capital investment for affordable housing development and (2) granting State funds for housing services that are delivered by other entities. The Maryland Department of Housing and Community Development (DHCD) coordinates statewide efforts to reduce the numbers of homeless people. DHCD's Homelessness Solutions Program awards federal and State grants to support homeless shelters and homeless services across Maryland, including Montgomery County. Some of this grant funding is available for rent subsidies.

The State of Maryland offers financing programs to assist non-profit and for-profit developers create or preserve affordable rental housing units for low- to moderate-income residents. These programs are administered by DHCD and provide tax-exempt financing, tax credits, and low-interest loans to construct and preserve affordable rental housing in designated priority funding areas. Several of the State-administered affordable housing financing programs are funded by federal dollars. For example, the federal HOME Program (HOME) provides federal funds to Maryland and to localities to finance the construction, acquisition, and rehabilitation of rental housing, owner-occupied housing, and special needs housing.

D. Montgomery County Agencies

Within Montgomery County, a network of quasi-public, public, and non-profit organizations provide housing assistance to low-income residents.

1. Housing Opportunities Commission

The Housing Opportunities Commission (HOC) of Montgomery County is a quasi-public agency that serves as the County's federally-authorized and State-designated Public Housing Authority (PHA). As the County's PHA, HOC administers several federally-funded housing assistance programs, including the Housing Choice Voucher program which comprises the single largest source of rental housing assistance in the County. HOC also administers several local rent assistance programs. HOC has created an online portal for residents to apply for HOC-administered rent assistance. See page 10 for additional details about the rent subsidy programs administered by HOC.

2. Montgomery County Government

Within the Montgomery County Government, the Departments of Housing and Community Affairs (DHCA) and Health and Human Services (DHHS) work to increase the supply of affordable and special needs housing.

DHCA manages the expenditure of federal and State grants to promote capital investment in affordable and special needs housing. DHCA serves as the lead agency responsible for developing the County's Consolidated Plan to HUD for federal funding under the Community Planning and Development formula grant programs (see below). DHCA also oversees the County's Housing Initiative Fund (see Chapter 3 of this report) and manages other County Government affordable housing programs, such as the MPDU program.

DHHS is the primary Montgomery County Government department responsible for implementing rent subsidy programs. As detailed in Chapter 3, DHHS is responsible for managing the Rental Assistance Program⁷ and the Housing Initiative Program.⁸ In addition, DHHS contracts with multiple non-profit organizations to provide housing assistance, including rent subsidies, for County residents. See page 12 for additional details about rent subsidy programs administered by DHHS.

3. Municipalities and Non-Profit Organizations

Several County municipalities administer programs to provide affordable housing for their residents. In addition, multiple non-profit organizations offer rent subsidies to County residents. These programs typically are funded through a combination of private charitable donations and public sector grants.

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⁷ County Code, Sections 41A-1.

⁸ Code of County Regulations, Section 02.42A.07.

E. Federal Funding and Requirements for Homelessness Prevention

For communities seeking federal funds for homelessness prevention, HUD has established a process to promote coordination among different service providers. HUD requires communities applying for federal homelessness grants to establish a Continuum of Care (CoC) entity. A CoC is a local planning network that supports local organizations and coordinates local efforts to prevent and reduce homelessness. The 2009 federal HEARTH Act consolidated several federal grant programs into the CoC process. The purpose for this consolidation was to better measure the cumulative results of the services to eliminate homelessness (and not just their individual impact) and to identify areas for improvement. According to HUD:

The need to provide specialized services for different sub-populations means some services or programs are appropriate for some groups of clients but not others. In addition, a single client may need the help of numerous mainstream services beyond housing including health care, cash benefits, food, employment, and substance abuse treatment. Community-wide planning and coordination among homeless service providers and mainstream service providers is important if individuals are to get the help they need and eventually leave homelessness. ¹⁰

The governing board for the Montgomery CoC is the Montgomery County Interagency Commission on Homelessness (ICH), which acts on behalf of County residents experiencing homelessness to provide advice, counsel, and recommendations to the County Executive and County Council. The ICH is a public-private partnership comprised of representatives from the County Government, HOC, municipalities, the Montgomery County Public Schools, non-profit service providers, citizens, and others who have a role in the County's affordable housing initiatives. The ICH submits a single comprehensive application to HUD for federal homelessness prevention funding.

F. Federal Funding and Requirements for Community Planning and Development

HUD has also established a process for regional coordination to apply for federal funding under the Community Planning and Development formula grant programs. HUD requires public and private service providers in a geographic area to prepare one comprehensive strategic Consolidated Plan every five years. The Consolidated Plan must describe, among other things, "the public and private agencies that address housing, health, social services, employment, or education needs of low-income individuals and families, of homeless individuals and families, of youth, and/or of other persons with special needs." In addition to the Consolidated Plan, jurisdictions receiving these federal formula grant funds must submit an annual Action Plan to HUD that describes the activities to be undertaken during the next year including: an estimate of the number and type of families that will benefit from the proposed activities, the specific local objectives and priority needs that will be addressed by the activities, proposed accomplishments, a target date for completion of the activity, and outcome measures for

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⁹ Montgomery County Interagency Commission on Homelessness Meeting, Technical Assistance Collaborative, September 16, 2015 (slide 5); retrieved from

www.montgomerycountymd.gov/Homelessness/Resources/Files/Meetings/15.Sep16FullPresentation.pdf.

¹⁰ <u>HUD'S Homeless Assistance Programs Continuum of Care 101</u> (June 2009); retrieved from www.hudexchange.info/resources/documents/CoC101.pdf.

¹¹ Code of Federal Regulations, 24 CFR 91.215 - Strategic plan.

¹² Code of Federal Regulations, 24 CFR 91.200 - General.

activities included in its action plan. ¹³ Representatives from DHCA, DHHS, HOC, the Montgomery County CoC, the Montgomery County Community Development Advisory Committee, Rockville Housing Enterprises, and others collaborate to prepare the Consolidated and Action Plans.

G. Coordinated Entry System

As required by HUD, the Montgomery County CoC employs a Coordinated Entry System (CES) to link homeless people with the housing services best suited to their needs. HUD requires the CES to standardize the assessment and referral processes for potential program participants. According to HUD,

HUD's primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present. [...] Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and gaps to help communities plan their assistance and identify needed resources.¹⁴

DHHS administers the CES for the Montgomery County CoC. The Montgomery County CoC currently uses a "No Wrong Door" approach intended to add non-traditional partners to the CES process. This requires decentralizing the access points for entering the system. Ideally, wherever a person experiencing homelessness frequents, such as libraries, hospitals and jails, will have staff trained to conduct a housing screening tool and enter that person (or household) in the housing prioritization registry. The CES plays an important role in implementing the No Wrong Door approach because all coordinated entry locations and methods (phone, in-person, online, etc.) offer the same assessment approach and referrals are made using the same decision-making processes. HUD's goal in promoting the use of CES is that a person presenting at a particular coordinated entry location will not be steered towards any particular program or provider simply because they presented at that location.¹⁵

¹³ Code of Federal Regulations, 24 CFR 91.220 - Action plan.

¹⁴ HUD Coordinated Entry Policy Brief, p. 1; retrieved from www.hudexchange.info/resources/documents/Coordinated-Entry-Policy-Brief.pdf.

¹⁵ *Ibid*, p. 2.

Chapter 3: Rent Subsidy Programs Administered in Montgomery County

County residents receive rent subsidies funded by federal, State and County resources as well as private donations. Rent subsidy programs are administered through a network of local public, quasi-public, and non-profit organizations. This chapter provides an overview of rent subsidy programs administered in Montgomery County categorized based on the local administering organization.

A. Housing Opportunities Commission

The Housing Opportunities Commission (HOC) is a quasi-public agency that serves as the County's Public Housing Authority and Housing Finance Agency. HOC is responsible for administering the federally-funded Housing Choice Voucher programs which comprise most of the rent subsidies administered in the County, as well as four smaller locally-funded subsidy programs.

The federally-funded subsidy programs administered by HOC include:

- Housing Choice Vouchers: HOC administers the federal Housing Choice Voucher (HCV) ¹⁶ program in Montgomery County. ¹⁷ HCV program participants rent in the private market; the voucher provides the landlord an amount equal to the difference between the market rent and 30% of the household's gross adjusted monthly income (subject to a maximum subsidy amount). Families are eligible to receive a voucher if they are either (a) very low-income (50% or less of AMI) or, (b) extremely low-income (80% or less of AMI) and meet other special criteria (for example, are elderly or have disabilities). The federal program requires HOC to allocate 75% of all vouchers available in a year to extremely low-income families (30% or less of AMI). Federal Housing Choice Vouchers fall into the following categories:
 - Tenant-Based Vouchers: Tenant-based housing choice vouchers are granted to incomeeligible households (individuals or families) to assist with rent payments for the housing unit of their choice. Vouchers are nationally portable: the recipient can use the voucher in any location in the United States where the HCV program is administered.
 - Project-Based Vouchers: Project-based housing choice vouchers are attached to specific housing units and are not portable. HOC enters into a housing assistance payment contract with the housing unit owner and makes payments to the owner for units leased by eligible households. While project-based vouchers are not portable, households receiving this benefit have priority for available tenant-based vouchers when they move to a new location.¹⁸

¹⁶ Federal housing choice vouchers were formerly known as Section 8 vouchers.

¹⁷ Rockville Housing Enterprises (RHE) administers the Housing Choice Voucher program for Rockville residents. RHE currently administers vouchers for about 400 units.

¹⁸ The federal government offers other project-based rental assistance (PBRA) through contracts directly with private landlords to subsidize rents for low-income tenants. Unlike project-based vouchers, households receiving assistance via PBRA do not have priority for continued assistance if they move. PBRA benefits function more like an affordable housing incentive for landlords and so are not included in the scope of this report.

- Non-Elderly Disabled: Federal law authorizes public housing authorities to develop a Non-Elderly Disabled (NED) housing voucher program for families whose head of household, spouse, or co-head is under age 62 and has a disability. The voucher covers the difference between the monthly rent amount (capped based on family size and location) and the household rent payment (generally capped at 40% of the family's monthly adjusted income). To be eligible, a family's household income may not exceed 50% of AMI.
- Veterans Affairs Supportive Housing: The Veterans Affairs Supportive Housing (VASH) program offers housing choice vouchers to homeless veterans with severe psychiatric or substance abuse disorders. To qualify for a VASH voucher, the veterans must receive a referral from a Veterans Affairs Medical Center and have household gross income below 50% of AMI. VASH housing assistance is combined with case management and clinical services.

Tables 3-5 (pages 18–20) summarize the provisions of the various Housing Choice Voucher programs.

• McKinney-Vento Supportive Housing Program: HOC administers the McKinney-Vento Supportive Housing Program funded by the U.S. Department of Housing and Urban Development (HUD). This program provides rent subsidies to residents who are homeless, have a documented disability, and have a documented need for assistance. Table 6 (page 21) summarizes the provisions of the McKinney-Vento Supportive Housing Program.

In addition, HOC administers four other locally-funded rent subsidy programs. The Rent Supplement Program is funded through County recordation tax revenues.

• Rent Supplement Program: The Rent Supplement Program is available to County residents with a gross household income of between 20% and 40% of AMI who do not receive any form of federally-funded housing assistance. Table 7 (page 22) summarizes the provisions of the Rental Supplement Program.

The following three rent subsidy programs are funded by the County's Housing Initiative Fund as specified in a memorandum of understanding between HOC and the County's Department of Housing and Community Affairs.

- The <u>Community Choice Homes Initiative</u> assists individuals exiting nursing homes and nonelderly persons with disabilities. Table 8 (page 23) summarizes the provisions of this program.
- The <u>Move-Up Initiative</u> assists individuals and families transitioning from permanent supportive housing to long-term housing without supportive services. Table 9 (page 24) summarizes the provisions of the Move-Up Initiative.
- The <u>Youth Bridge Initiative</u> will assist individuals aging out of the foster care system. Table 10 (page 25) summarizes the provisions of this program.

HOC operates an online portal for residents to apply for HOC-administered rent assistance programs. The "Housing Path" portal directs users through a step-by-step process to match applicants with appropriate HOC housing programs based on their household size, self-reported income, age and other factors. Full program eligibility is validated once a household is selected from the wait list.

B. Montgomery County Government

Two County departments, the Department of Housing and Community Affairs (DHCA) and the Department of Health and Human Services (DHHS), play a role in implementing County rent subsidy programs.

DHCA serves as the lead agency responsible for developing and submitting the County's Consolidated Plan to receive federal funding under the Community Planning and Development formula grant programs: Community Development Block Grants, Home Investment Block Grants, Emergency Shelter Grants, and Housing Opportunities for Persons with AIDS.

In addition, DHCA oversees the process of allocating County Housing Initiative Fund (HIF) dollars to the entities who administer them. The County loans HIF dollars to non-profit and for-profit property owners and developers to acquire, build, or renovate affordable housing units. DHCA also allocates HIF dollars for rent subsidies. While DHCA allocates HIF dollars, HOC and DHHS administer the rent subsidy programs that receive HIF funding.

DHHS' Division of Public Health Services is responsible for local administration of a federally-funded housing voucher program to serve residents diagnosed with HIV/AIDs.

• Housing Opportunities for Persons with AIDS: The Housing Opportunities for Persons with AIDS (HOPWA) program provides housing choice vouchers to persons who are diagnosed with HIV/AIDS (or a related disease) and have a household income that is at or below 80% of AMI. Table 11 (page 26) summarizes the provisions of the HOPWA program.

DHHS's Division of Services to End and Prevent Homelessness directly administers a rent subsidy program established in the County Code:¹⁹

• Rental Assistance Program: Through this program, eligible low-income households may receive rent subsidies of between \$50 and \$200 per month. Households of two or more persons (or one person who is at least 62 years of age or disabled) with gross income at or below 50% of the area median income (AMI) limit are eligible to receive rent subsidies under this program. Table 12 (page 27) summarizes the provisions of the County Rental Assistance Program.

In addition, the County Code generally authorizes DHHS to administer programs that provide human services. Under this authorization, DHHS's Division of Services to End and Prevent Homelessness uses a combination of federal, State and County funds to offer rent subsidies in two general categories:

¹⁹ County Code, Sections 41A-1.

- Rapid Re-Housing: Rapid re-housing (RRH) programs provide temporary rent assistance, combined with services, for individuals and families exiting homelessness. Rapid re-housing units are intended for people with a temporary need for rent assistance and case management services as a pathway to permanent housing. Tables 13–16 (pages 28-31) and Table 30 (page 45) summarize the provisions of rapid re-housing supportive housing programs operated by DHHS and non-profit organizations through contracts with DHHS.
- Permanent Supportive Housing: Permanent supportive housing (PSH) programs provide long-term rent assistance, combined with case management services to people with disabilities. Residents of permanent supportive housing have an on-going need for both rent assistance and case management services. Tables 17-30 (pages 32-45) summarize the provisions of permanent supportive housing programs operated by non-profit organizations through contracts with DHHS. In 2008, Montgomery County implemented a "Housing First" model which is used for all PSH programs. This model includes both prevention and intervention activities to help individuals and families exit homelessness rapidly with the primary goal of placement in permanent supportive housing. One PSH program is distinguished from the others; County regulation mandates that DHHS implement a specific permanent supportive housing rent subsidy program, the Housing Initiative Program.²⁰ As detailed below, DHHS contracts with non-profit organizations to implement the Housing Initiative Program.

C. Municipalities and Non-Profit Organizations

The sections above described rent subsidy programs administered either directly or via contract by HOC or the County Government. Some County residents also receive rent subsidies through programs administered by municipalities and non-profit organizations. For example, Rockville Housing Enterprises (RHE) is the Public Housing Authority for the City of Rockville and administers the Housing Choice Voucher program for Rockville residents. In addition, some non-profit organizations offer rent subsidies to County residents. These programs typically are funded through a combination of private charitable donations and public sector grants.

²⁰ Code of County Regulations, Section 02.42A.07.

D. Summary of Program Funding and Subsidies Provided

OLO identified 29 rent subsidy programs administered in Montgomery County that are intended to prevent tenants from paying an excessive portion of household income on rent. These rent subsidy programs make housing assistance payments on behalf of households (individuals or families) who would be otherwise unable to obtain or retain permanent housing due to low income and/or a disabling condition. The inventory excludes programs that provide short-term emergency housing assistance. For most programs, the subsidy is set at a level to assure that households (individuals or families) expend no more than 30 percent of household income on rent. The tables on the following pages present summary information about the funding level and number of household subsidies associated with each program.

The tables display the following information:

- The <u>Program Name</u> is the name of the subsidy program as specified in law, regulation, or contract. Further details about each program appear in the tables at the end of this chapter.
- Year refers to the most recent fiscal or calendar year for which data is available.
- <u>Program Budget</u> refers to the total expenditures (actual or budgeted) of the program including Housing Assistance Payments, the cost of supportive services, and administrative costs.
- <u>Housing Assistance Payments</u> refers to expenditures on rent (and in some cases, utility) subsidies in the most recent year for which data is available.
- Number of Subsidies is a count of the number of household units (either families or individuals) for whom the Local Managing Agency made a housing assistance payment in the most recent year for which data is available. In most cases, the number of subsidies reflects an average monthly total for the year.

Additional program-specific demographic and financial data appear on pages 52-53 (Tables 31 and 32).

Table 1: HOC-Administered Rent Subsidy Programs				
Program Name	Year	Total Program Expenditures	Housing Assistance Payment Expenditures	Number of Subsidies
Tenant-Based Housing Choice Vouchers	CY 2018	\$82,825,179	\$77,366,676	5,660
Project-Based Housing Choice Vouchers	CY 2018	\$9,042,079	\$8,375,738	702
Non-Elderly Disabled Voucher Program	CY 2018	\$8,536,788	\$7,944,221	625
Veteran's Affairs Supportive Housing Voucher Program	CY 2018	\$1,072,578	\$995,378	79
McKinney-Vento Supportive Housing Program	CY 2018	\$4,906,950	\$3,075,324	197
Rent Supplement Program	FY 2018	\$1,734,186	\$1,557,256	305
Community Choice Homes Initiative	FY 2018	\$76,470	\$17,000	8
Move-Up Initiative	FY 2018	\$73,969	\$73,969	8
Youth Bridge Initiative	FY 2018	\$9,980	\$9,980	5

Table 2: DHHS-Administered Rent Subsidy Programs

Program Name	Fiscal Year	Total Program Expenditures	Housing Assistance Payment Expenditures	Number of Subsidies
Housing Opportunities for Persons with AIDS	FY 2018	\$1,038,431	\$704,610	64
Rental Assistance Program	FY 2018	\$4,214,855	\$3,754,998	1,720
Rapid Re-housing: DHHS	FY 2018	\$869,039	\$509,571	105
Rapid Re-housing: Catholic Charities	Full-year expenditure data is not available as this program is in its first year of implementation.			
Rapid Re-housing: National Center for Children and Families	FY 2019	\$510,000	\$300,687	20
Rapid Re-housing: Young Adult Head of Households	FY 2018	\$906,792	\$413,052	21
Permanent Supportive Housing: Housing Initiative Program	FY 2019	\$9,314,282	\$6,988,200	400
Permanent Supportive Housing: Partnership for Permanent Housing (PPH1)	Data unavailable (see page 50)			
Permanent Supportive Housing: Partnership for Permanent Housing 2 (PPH2)	Data unavailable (see page 50)			
Permanent Supportive Housing: Home First	FY 2018 \$1,330,309 \$392,216		30	

Table 2: DHHS Administered Rent Subsidy Programs (continued)				
Program Name	Fiscal Year	Total Program Expenditures	Housing Assistance Payment Expenditures	Number of Subsidies
Permanent Supportive Housing: Operation Homecoming	FY 2019	\$466,529	\$202,000	10
Permanent Supportive Housing: Seneca Heights Apartments	Da	ta unavailable (see paş	ge 50)	
Permanent Supportive Housing: Cordell Place	Da	ta unavailable (see paş	ge 50)	
Permanent Supportive Housing: Vulnerable Initiative Program	FY 2019	\$551,196	\$199,000	15
Permanent Supportive Housing: Creative Housing Initiative Program	Data unavailable (see page 50)			
Permanent Supportive Housing: Hope Housing	FY 2018	\$799,249	\$296,085	50
Permanent Supportive Housing: Keys First Program	FY 2018	\$1,236,605	\$553,068	28
Permanent Supportive Housing: Interfaith Homes	FY 2018	\$459,430	\$259,514	31
Permanent Supportive Housing: Becky's House	Data unavailable (see page 50)			
Rapid Re-housing / Perm. Supportive Housing: Veteran's Housing Program	FY 2019 \$275,012		\$132,250	12

TABLE 3: TENANT AND PROJECT BASED HOUSING CHOICE VOUCHER (HCV) PROGRAM Administered by the Housing Opportunities Commission			
Funding Source:	The Federal Government provides funding for Housing Choice Voucher housing assistance payments.		
Household Eligibility:	• A "family" may be eligible for an HCV rental subsidy. HUD defines a family as "a single person or a group of persons," including a family with a child or children, two or more elderly persons or disabled persons living together, or one or more elderly or disabled persons living with one or more live-in aides.		
Income Limits:	 At least 75% of families must have household gross income below 30% of AMI. HOC may distribute up to 25% of vouchers to families between 30% and 50% of AMI. 		
Subsidy Amount:	The HCV subsidy equals the allowable rent payment based on unit size and the local rental market conditions minus the formula-based amount of household income that a family must contribute toward rent.		
	• The amount a family pays in rent may not exceed 40% of the family's monthly adjusted income.		
Duration of Benefit:	A family may receive the benefit as long as they remain eligible and program funds are available.		
	• The HCV program currently has a waiting list of approximately 30,000 families.		
Path of Entry:	• HOC uses an online portal for families to apply for the HCV benefit. Applicants are put on the HCV waiting list. As funding is available, HOC notifies waiting list applicants when they are selected to get a benefit.		
Supportive Services:	The tenant- and project-based HCV programs do not include supportive services for program participants.		
Limitations:	 HOC established preferences for HCV benefits: (1) families displaced by a redevelopment project; (2) families who live or work in the County; (3) families with a head of household or spouse who qualifies for the HUD Mainstream Disabled program; (4) veterans; and (5) families with histories of homelessness. Federal law prohibits recipients from combining HCV subsidies with other state 		
	or local rent subsidies.		
Eligible Housing:	<u>Tenant-Based</u> : A family may use a tenant-based HCV for any housing unit that meets HUD housing quality standards.		
Englote Housing.	Project-Based: A family may use a project-based HCV for units for which the owner has entered into a housing assistance payment contract with HOC.		
Legal Framework:	 The HCV program is governed by Federal regulations (24 CFR Part 982) and administered in Montgomery County by HOC. 		

TABLE 4: NON ELDERLY DISABLED VOUCHER PROGRAM (NED) Administered by the Housing Opportunities Commission				
Funding Source:	The Federal Government funds NED housing assistance payments. The funding mechanism is an allocation of federal Housing Choice Vouchers.			
Household Eligibility:	Income eligible families whose head of household, spouse or co-head is non-elderly (under age 62) and disabled may receive a NED voucher. Families with only a minor child with a disability are not eligible.			
Income Limits:	For most families, household gross income must be below 50% of AMI.			
	HOC pays the difference between the HOC-determined payment standard for the family size and the family's total tenant payment.			
Subsidy Amount:	The family may choose a unit with a higher gross rent than the payment standard and pay the owner the difference, but upon initial occupancy the family's share is capped at 40 % of the family's monthly adjusted income.			
Duration of Benefit:	A family may receive the benefit as long as they remain eligible and program funding remains available.			
Path of Entry:	Families may apply for a NED voucher through the HOC online portal.			
Supportive Services:	The NED Voucher program does not include supportive services for participants.			
Limitations:	Federal law prohibits recipients from combining NED vouchers with other state or local rent subsidies.			
Eligible Housing:	An eligible family may use a NED voucher benefit to assist in making rental payments for any type of housing unit that meets HUD and HOC housing quality standards.			
Legal Framework:	The NED program is governed by Federal regulations (24 CFR Part 982) and administered in Montgomery County by HOC.			

	TABLE 5: VETERAN'S AFFAIRS SUPPORTIVE HOUSING (VASH) Administered by the Housing Opportunities Commission
Funding Source:	The Federal Government funds VASH housing assistance payments. The funding mechanism is an allocation of federal Housing Choice Vouchers.
Household Eligibility:	 The VASH program serves homeless veterans who are eligible for VA health care benefits. The VASH program is limited to veterans who have serious mental illness, substance use disorder history, or physical disability.
Income Limits:	 A veteran's household gross income must be below 50% of AMI to qualify. Housing Choice Voucher income targeting requirements do not apply to VASH.
Subsidy Amount:	 As with the HCV program, the VASH subsidy equals the "payment standard" minus the "total tenant payment." (The payment standard is the allowable rent payment based on unit size and the local rental market conditions. The total tenant payment is formula-based amount a household must contribute toward rent based on income.) HOC pays the rent subsidy directly to the landlord. The amount a household pays in rent may not exceed 40% of the household's monthly adjusted income.
Duration of Benefit:	A household may receive the benefit as long as they remain eligible and program funds are available.
Path of Entry:	 To receive a VASH housing voucher, veterans must be referred by a Veterans Affairs Medical Center. HOC receives VASH referrals from the Veterans Affairs Medical Center in Washington, D.C. via the County's Coordinated Entry System. Under Federal law, HOC may not maintain a waiting list or apply local preferences for VASH vouchers.
Supportive Services:	Program beneficiaries must participate in case management and utilize supportive services and assistance.
Limitations:	Federal law prohibits recipients from combining VASH housing vouchers with other state or local rent subsidies.
Eligible Housing:	A veteran may use a VASH housing voucher to assist in making rental payments for any housing unit that meets HUD housing quality standards.
Legal Framework:	The VASH program is governed by Federal regulations (24 CFR Part 982) and administered in Montgomery County by HOC.

TABLE 6: MCKINNEY VENTO SUPPORTIVE HOUSING PROGRAM Administered by the Housing Opportunities Commission				
Funding Source:	The Federal Government funds the McKinney-Vento Supportive Housing Program.			
Household Eligibility:	• The program is intended for residents who are homeless, have a documented disability and have a documented need for assistance in order to obtain or retain rental housing.			
Income Limits:	The McKinney-Vento Supportive Housing Program imposes no income limits; however, participants must have a rent burden that exceeds 30% of monthly household income.			
Subsidy Amount:	• This program offers a monthly subsidy of up to the fair market rent amount for a unit.			
Duration of Benefit:	 The subsidy benefit extends for 12 months. Program participants may annually apply for an additional year of subsidies if they meet the recertification requirements. 			
Path of Entry:	HOC receives referrals through the County CoC's Coordinated Entry System.			
Supportive Services:	This program offers supportive services through case management provided by HOC.			
Limitations:	Participants may not receive a Housing Choice Voucher or any other Federal housing assistance.			
Eligible Housing:	Assistance from this program is available for rental units throughout the County that have entered into a contract with HOC.			
Legal Framework:	The provisions of the McKinney-Vento Supportive Housing Program are stipulated in regulations from the U.S. Department of Housing and Urban Development.			

TABLE 7: RENT SUPPLEMENT PROGRAM Administered by the Housing Opportunities Commission			
Funding Source:	The Rent Supplement Program is funded through County recordation tax revenues.		
Household Eligibility:	The program is intended for residents who have a documented need for assistance in order to obtain or retain rental housing.		
Income Limits:	 Household gross income must be between 20% and 40% of AMI. Total household assets must be less than \$10,000. 		
Subsidy Amount:	• This program offers a subsidy of up to \$600 per month.		
Duration of Benefit:	 The subsidy benefit extends for 12 months. Program participants may annually apply for an additional year of subsidies if they meet the recertification requirements. 		
Path of Entry:	 HOC accepts applications for the Rent Supplement Program. HOC currently maintains a manual waiting list but is working to add the Rent Supplement Program to its Housing Path online portal. 		
Supportive Services:	This program does not offer supportive services or have a case management requirement.		
Limitations:	Participants may not receive a Housing Choice Voucher or any other Federal housing assistance.		
Eligible Housing:	Assistance from this program is available for rental units at five privately owned multi-family properties that have entered into a Rent Supplement Program contract with HOC.		
Legal Framework:	The provisions of the Rent Supplement Program are stipulated in a Memorandum of Understanding between DHCA and HOC.		

TABLE 8: COMMUNITY CHOICE HOMES INITIATIVE Administered by the Housing Opportunities Commission		
Funding Source:	The Community Choice Homes Initiative is funded through County recordation tax revenues.	
Household Eligibility:	• The program is intended for residents who are exiting nursing homes or are non- elderly persons with disabilities who have a documented need for assistance in order to obtain or retain rental housing.	
Income Limits:	Total household income must be no higher than 30% of AMI.	
Subsidy Amount:	• This program offers a monthly subsidy of up to the fair market rent amount for a unit minus the amount each household is responsible for paying (30% of their monthly household income).	
Duration of Benefit:	 The subsidy benefit extends for 12 months. Program participants may annually apply for an additional year of subsidies if they meet the recertification requirements. 	
Path of Entry:	HOC receives referrals/applicants directly from the Maryland Department of Disabilities.	
Supportive Services:	This program does not directly offer supportive services or have a case management requirement. However, residents are provided supportive services through other State and County resources.	
Limitations:	• Participants may not receive a Housing Choice Voucher or any other Federal housing assistance.	
Eligible Housing:	Assistance from this program is available for rental units owned by HOC only.	
Legal Framework:	The provisions of the Community Choice Homes Initiative are stipulated in a Memorandum of Understanding between DHCA and HOC.	

TABLE 9: MOVE UP INITIATIVE Administered by the Housing Opportunities Commission		
Funding Source:	The Move-Up Initiative is funded through County recordation tax revenues.	
Household Eligibility:	The program is intended for residents residing in a permanent supportive housing program within the County's Continuum of Care who has been determined to no longer need the supportive services but still need subsidy assistance.	
Income Limits:	Total household income must be no higher than 60% of AMI.	
Subsidy Amount:	• This program offers a monthly subsidy of up to the fair market rent amount for a unit minus the amount each household is responsible for paying (30% of their monthly household income).	
Duration of Benefit:	 The subsidy benefit extends for 12 months. Program participants may annually apply for an additional year of subsidies if they meet the recertification requirements. 	
Path of Entry:	HOC receives referrals/applicants directly from the County Department of Health and Human Services.	
Supportive Services:	This program does not offer supportive services or have a case management requirement.	
Limitations:	Participants may not receive a Housing Choice Voucher or any other Federal housing assistance.	
Eligible Housing:	Assistance from this program is available for rental units throughout the County that have entered into a Move-Up Initiative contract with HOC.	
Legal Framework:	The provisions of the Move-Up Initiative are stipulated in a Memorandum of Understanding between DHCA and HOC.	

TABLE 10: YOUTH BRIDGE INITIATIVE Administered by the Housing Opportunities Commission		
Funding Source:	The Youth Bridge Initiative is funded through County recordation tax revenues.	
Household Eligibility:	• The program is intended for residents who have aged out of the County's foster care system who have a documented need for assistance in order to obtain or retain rental housing.	
Income Limits:	• Total household income must be no higher than 60% of AMI.	
Subsidy Amount:	• This program offers a monthly subsidy of up to the fair market rent amount for a unit minus the amount each household is responsible for paying (30% of their monthly household income).	
Duration of Benefit:	• The subsidy benefit extends for a period of up to 24 months.	
Path of Entry:	• HOC receives referrals/applicants directly from the Department of Health and Human Services.	
Supportive Services:	 This program does not directly offer supportive services or have a case management requirement. However, residents are provided supportive services (as needed) through other County resources. 	
Limitations:	• Participants may not receive a Housing Choice Voucher or any other Federal housing assistance.	
Eligible Housing:	• Assistance from this program is available for rental units throughout the County that have entered into a Youth Bridge Initiative contract with HOC.	
Legal Framework:	• The provisions of the Youth Bridge Initiative are stipulated in a Memorandum of Understanding between DHCA and HOC.	

TABLE 11:		
HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA) Administered by the County Department of Health and Human Services		
Funding Source:	The Federal Government funds HOPWA housing assistance payments.	
Household Eligibility:	• Family members of a person diagnosed by a medical professional with HIV/AIDS (or a related disease) may receive the rent subsidy.	
	 Under Federal regulation, a family member includes one or more eligible persons living with another person or persons who are determined to be important to the eligible person or person's care or well-being. 	
Income Limits:	• Persons diagnosed with HIV/AIDS (or a related disease) are eligible to receive HOPWA rental assistance if their household income is at or below 80% of AMI.	
Subsidy Amount:	• The subsidy amount equals the difference between the "rent standard" and the "resident rent payment." (The rent standard is the allowable rent payment based on local fair market rents. The resident rent payment is the highest of: (a) 30% of household monthly adjusted income (adjustment factors including medical expenses, size of family and child care expenses); (b) 10% of the household's monthly gross income; or (c) the portion of the household's monthly welfare assistance payment that is designated for housing costs.)	
Duration of	Recipients may continue to receive the benefit as long as they remain eligible and program funds are available.	
Benefit:	Surviving family members living in a HOPWA-assisted unit may continue to reside in the unit for up to one year following the eligible person's death.	
Path of Entry:	DHHS maintains the local waiting list for HOPWA assistance. At present, there are no applicants on the waiting list.	
Supportive Services:	Federal regulations require that supportive services be provided as part of any HOPWA-assisted housing.	
	HOPWA benefits may not be used for HOC housing.	
Limitations:	 HOPWA subsidies must meet a "reasonableness" test to assure that the rent charged for the unit is comparable to that charged (a) for units in the private unassisted market; and (b) by the landlord for comparable unassisted units. 	
Eligible Housing:	HOPWA benefits may be used for multiple housing types including emergency housing and shelters, rapid-rehousing, transitional housing, nursing homes, and other types of permanent housing.	
Legal Framework:	 The HOPWA program is governed by Federal regulations (24 CFR Part 574) and administered in Montgomery County by DHHS. 	

TABLE 12: RENTAL ASSISTANCE PROGRAM Administered by the County Department of Health and Human Services		
Funding Source:	The Rental Assistance Program is funded through County Housing Initiative Funds and County General Funds.	
Household Eligibility:	 Household must be of two or more persons to be eligible for the subsidy. Subsidy available to a household of one person who is at least 62 years old or is disabled. 	
Income Limits:	To be eligible for the subsidy, household gross income must be below 50% of AMI (excluding child care and ongoing medical expenses not reimbursed by insurance). Total household except must be less than \$10,000.	
Subsidy Amount:	 Total household assets must be less than \$10,000. Under County regulations, approved households receive a monthly rental subsidy of between \$50 and \$200 (depending on household size and how much rent costs exceed a designated percentage of the recipient's household income). 	
Duration of Benefit:	 An approved applicant initially may receive benefits for up to 12 months. After 12 months, the renter must reapply and demonstrate continued eligibility to receive rental assistance for up to an additional 12 months. 	
Path of Entry:	 County RAP currently has a waiting list of approximately 3,000 households. DHHS accepts pre-applications from renters. As openings occur, DHHS notifies eligible applicants when they are selected to apply for benefits. 	
Supportive Services:	This program does not offer supportive services or have a case management requirement.	
Limitations:	• Federal regulations prohibit the County from offering RAP subsidies to households that receive a Housing Choice Voucher or live in public housing.	
Eligible Housing:	 Subsidy may only be used for housing units with rents that do not exceed 120% of the average cost for a "suitable size rental unit." In some instances, County RAP will provide subsidies for room or basement rentals. 	
Legal Framework:	 County RAP is established in Chapter 41A of the County Code. Regulations governing County RAP are in Section 41A.05.01 of the Code of County Regulations. Many program provisions (including the application process, eligibility requirements, and the subsidy amount) are set by regulation. 	

TABLE 13: RAPID RE HOUSING DHHS Administered by the County Department of Health and Human Services		
Funding Source:	• This Rapid Re-housing program is funded by a federal Emergency Solutions Grant, the County Housing Initiative Fund, and County General Funds.	
Household Eligibility:	 The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score between 3 and 9. All households must meet the HUD Category 1 or 4 definition of homelessness. 	
Income Limits:	• To be eligible for the subsidy, household income must be at or below 50% of AMI.	
Subsidy Amount:	• The subsidy amount varies based on the needs of the household; but the amount of assistance may not exceed the fair market cost of rent.	
Duration of Benefit:	• The benefit may be renewed every 90 days subject to recertification of the household's eligibility up to a maximum of 24 months.	
Path of Entry:	• All referrals for Rapid Re-housing must be made through the County's Coordinated Entry System.	
Supportive Services:	 Clients must receive case management services. The contractor must employ a Housing Advocate to assist program participants obtain and retain permanent housing. The contractor must assist residents to obtain utility assistance, medical insurance, and other benefits and must refer household members for medical and behavioral health care, as necessary. 	
Limitations:	• Federal regulations prohibit the County from offering Rapid Re-housing subsidies to households that receive a Housing Choice Voucher or live in public housing.	
Eligible Housing:	 Clients may reside in housing units with rents that comply with the Fair Market Rent standards determined by HUD. An eligible housing unit may be a room, apartment, house, or mobile home and must meet federal and State habitability standards. 	
Legal Framework:	 Federally-funded rapid re-housing programs are governed by Federal regulations (24 CFR Part 576). The program is also governed by the Annotated Code of Maryland Housing and Community Development Article, Section 4-1403. 	

TABLE 14: RAPID RE HOUSING CATHOLIC CHARITIES	
	istered by Catholic Charities of the Archdiocese of Washington, Inc. ontract with the County Department of Health and Human Services
Funding Source:	This Rapid Re-housing program is funded through Federal grants, the State Homelessness Solutions Program (HSP), and County General Funds.
Household Eligibility:	 This program serves homeless individuals or families that meet the County Continuum of Care's Coordinated Entry System eligibility criteria. The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score between 4 and 9.
Income Limits:	 Household gross income must be at or below 30% of AMI. Clients must demonstrate that without assistance their resources are insufficient to pay their full monthly rent.
Subsidy Amount:	The subsidy amount varies based on the needs of the household; but the amount of assistance may not exceed the fair market cost of rent.
Duration of Benefit:	The benefit may be renewed every 90 days subject to recertification of the household's eligibility up to a maximum of 24 months.
Path of Entry:	Participants must be referred through the County CoC's Coordinated Entry System.
Supportive Services:	 Clients must receive case management services. The contractor must assist residents to obtain utility assistance, medical insurance, and other benefits and must refer household members for medical and behavioral health care, as necessary.
Limitations:	• Federal regulations prohibit the County from offering Rapid Re-housing subsidies to households that receive a Housing Choice Voucher or live in public housing.
Eligible Housing:	 Clients may reside in housing units with rents that comply with the Fair Market Rent standards determined by HUD. An eligible housing unit may be a room, apartment, house, or mobile home and must meet federal and State habitability standards.
Legal Framework:	 Federally-funded rapid re-housing programs are governed by Federal regulations (24 CFR Part 576). The provisions of this program are stipulated in a contract between DHHS and Catholic Charities of the Archdiocese of Washington, Inc.

TABLE 15:

RAPID RE HOUSING NATIONAL CENTER FOR CHILDREN AND FAMILIES Administered by National Center for Children and Families under contract with the County Department of Health and Human Services and the U.S. Department of Housing and Urban Development

and the U.S. Department of Housing and Urban Development	
Funding Source:	This Rapid Re-housing program is funded through a combination of Federal grants and County General Fund resources.
Household Eligibility:	 The program serves homeless families that meet the County Continuum of Care's Coordinated Entry System eligibility criteria. The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score between 4 and 9.
Income Limits:	 Household gross income must be at or below 40% of AMI. Clients must demonstrate that without assistance their resources are insufficient to pay their full monthly rent.
Subsidy Amount:	The subsidy amount varies based on the needs of the household; but the amount of assistance may not exceed the fair market cost of rent.
Duration of Benefit:	• Maryland Homelessness Solutions Program (HSP) regulations allow clients to receive rental assistance for up to 24 months in any three-year period (although HSP policy guidelines state that best practice is to provide assistance for three to six months).
Path of Entry:	Participants must be referred through the County CoC's Coordinated Entry System.
Supportive Services:	 The contractor must employ a Housing Advocate to assist program participants obtain and retain permanent housing. The contractor must assist residents to obtain utility assistance, medical insurance, and other benefits and must refer household members for medical and behavioral health care, as necessary.
Limitations:	Assistance may not be combined with other rent subsidies of the same type.
Eligible Housing:	 Clients may reside in housing units with rents that comply with the Fair Market Rent standards determined by HUD. An eligible housing unit may be a room, apartment, house, or mobile home and must meet federal and State habitability standards.
Legal Framework:	 Federally-funded RRH programs are governed by Federal regulations (24 CFR Part 576). The provisions of this program are stipulated in a contract between DHHS and National Center for Children and Families, Inc.

TABLE 16:

RAPID RE HOUSING YOUNG ADULT HEAD OF HOUSEHOLDS Administered by National Center for Children and Families, Inc. under contract with the County Department of Health and Human Services

Funding Source:	This Rapid Re-housing program is funded through the County's Housing Initiative Fund.
Household Eligibility:	 This program is intended for households headed by a person between the ages of 18 and 25 with children typically under the age of five who: (1) resides in emergency shelters; or, (2) are exiting a facility for persons fleeing domestic violence and are applying for emergency shelter; or (3) are exiting the foster care system and are applying for emergency shelter with a minor child. The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score between 4 and 9. All households must meet the HUD Category 1 or 4 definition of homelessness.
Income Limits:	• This program assists young adult heads of households who have an income below 50% of AMI or who otherwise do not have sufficient resources to obtain permanent housing.
Subsidy Amount:	• The subsidy amount varies based on the needs of the household; but the amount of assistance may not exceed the fair market cost of rent.
Duration of Benefit:	• A young adult head of household may receive a subsidy for up to 18 months (or until the household's gross monthly income exceeds 60% of AMI).
Path of Entry:	• Potential clients must be referred through the County Continuum of Care's Coordinated Entry System.
Supportive Services:	 The contractor must provide program participants with job readiness, employment counseling, career planning support and assistance in locating and securing affordable and stable housing. The contractor must refer school-aged children to Head Start or elementary schools. The contractor must assist heads of household obtain child care vouchers and locate appropriate child care.
Limitations:	• The subsidy terminates if a household's income exceeds 60% of AMI (or after 24 months, whichever occurs first).
Eligible Housing:	 Program participants may reside in housing units with rents that comply with the Fair Market Rent standards determined by HUD.
Legal Framework:	The provisions of the Young Adult Head of Households program are stipulated in a contract between DHHS and the National Center for Children and Families, Inc.

TABLE 17:		
PERMA	NENT SUPPORTIVE HOUSING HOUSING INITIATIVE PROGRAM	
undana	Administered by Multiple Contractors	
under co	ontract with the County Department of Health and Human Services	
Funding Source:	The PSH - Housing Initiative Program (HIP) is funded through County General Funds and a grant from the Maryland Assistance in Community Integration Services Pilot Program.	
	• Household income must be below 50% of AMI.	
Household Eligibility:	• The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher.	
Engionity.	• All households must meet the HUD Category 1 or 4 definition of homelessness.	
	One member of the household must have a disability.	
T T' '	• To be eligible for the subsidy, household income must be below 30% of AMI.	
Income Limits:	Total household assets must be less than \$10,000.	
Subsidy Amount:	• The subsidy equals the difference between monthly rent and utility costs and 30% of the participant's monthly household income.	
Duration of Benefit:	Household may continue to receive the subsidy as long as their income does not exceed 50% of AMI.	
Path of Entry:	Participants must be referred from the County's Coordinated Entry System.	
Supportive Services:	Contractors must provide assistance to promote housing stability for program participants.	
Limitations:	• The contract housing provider must assure that all HIP participants apply to HOC for a Housing Choice Voucher benefit; if the participant receives an equivalent rental assistance subsidy from another program, the participant is no longer eligible for rent assistance through HIP but remains eligible for supportive services.	
Eligible Housing:	Program participants may reside in scattered units (single family, apartment, condominium, mobile home, or room) with a rent that does not exceed 120% of the average Montgomery County rent for a unit of similar size.	
Legal Framework:	• The provisions of the Housing Initiative Program are stipulated in contracts between DHHS and the housing providers. Unless stated otherwise, all contract terms have the meanings prescribed to them in Montgomery County Executive Regulation 20-12 Requirements for the Housing Initiative Program.	

TABLE 18:

PERMANENT SUPPORTIVE HOUSING PARTNERSHIP FOR PERMANENT HOUSING Administered by the Montgomery County Coalition for the Homeless, Inc. under contract with the County Department of Health and Human Services

under contract with the County Department of Health and Human Services	
Funding Source:	The Partnership for Permanent Housing (PPH1) program is funded through County General Funds.
Household Eligibility:	 The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher. All households must meet the HUD Category 1 or 4 definition of homelessness.
Income Limits:	 Household gross income must be below 30% of AMI. Total household assets must not exceed the State of Maryland "Medically Needy Resource Standard."
Subsidy Amount:	• The subsidy equals the difference between monthly rent cost and 30% of the participant's monthly household income.
Duration of Benefit:	• Households may continue to receive the subsidy as long as their income does not exceed 50% of AMI.
Path of Entry:	Program participants must receive a referral from the County's Coordinated Entry System.
Supportive Services:	The contractor must assist program participants obtain emergency assistance and other benefits, maintain stable housing and access medical and behavioral health care.
Limitations:	• A household may not receive the subsidy if their income exceeds 50% of AMI.
Eligible Housing:	Program participants may reside in scattered units (single family, apartment, condominium, mobile home, or room) with a rent that does not exceed fair market rent for a unit of similar size.
Legal Framework:	The provisions of the PPH1 program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.

TABLE 19:

PERMANENT SUPPORTIVE HOUSING PARTNERSHIP FOR PERMANENT HOUSING 2
Administered by the Montgomery County Coalition for the Homeless, Inc.
under contract with the County Department of Health and Human Services

under contract with the County Department of Health and Human Services	
Funding Source:	The PSH – Partnership for Permanent Housing 2 (PPH2) program is funded through County General Funds.
Household	• Formerly homeless households, including families with children and single adults, are eligible to receive assistance through PPH2.
Eligibility:	The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher.
	Household income must be below 30% of AMI.
Income Limits:	Total household assets must not exceed the State of Maryland "Medically Needy Resource Standard."
Subsidy Amount:	• The subsidy equals the difference between monthly rent and utility costs and 30% of the participant's monthly household income.
Duration of	An approved applicant initially may receive benefits for up to 12 months.
Benefit:	Each year, the renter must reapply and demonstrate continued eligibility to continue to receive the subsidy.
Path of Entry:	Program participants must receive a referral from the County's Coordinated Entry System.
Supportive Services:	The contractor must assist program participants maintain stable housing and obtain medical care, mental health counseling, and government assistance.
Limitations:	• If a participating household includes any persons who are not legal residents, the contractor must reduce the rent subsidy by the percentage of household members who are not legal residents.
	• The contractor must assure that all households receiving a PPH2 rent subsidy apply to HOC for a Housing Choice Voucher benefit. A household is no longer eligible for rent assistance from PPH2 if they receive equivalent rental assistance subsidy from another housing subsidy program.
Eligible Housing:	PPH2 participants may reside in scattered units with a rent that does not exceed 100% of the Fair Market Rent for a unit of similar size as determined by the U.S. Department of Housing and Urban Development.
Legal Framework:	• The provisions of the PPH2 program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.

TABLE 20:

PERMANENT SUPPORTIVE HOUSING HOME FIRST

Administered by the Montgomery County Coalition for the Homeless, Inc. under contract with the County Department of Health and Human Services

Funding Source:	The PSH - Home First program is funded through a Federal Grant and County General Funds.
Household Eligibility:	 This program serves homeless individuals who: (1) meet the HUD definition of "chronically homeless;" (2) have a diagnosis of a severe and persistent mental health disorder; and (3) are referred from shelters, the Safe Havens program, or are unsheltered. The program is available to households with a Vulnerability Index-Service
	Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher.
Income Limits:	Household income must be below 30% of AMI.
Subsidy Amount:	• The subsidy equals the difference between monthly rent cost and 30% of the participant's monthly household income.
Duration of Benefit:	Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.
Path of Entry:	Program participants must receive a referral from the County's Coordinated Entry System.
Supportive Services:	• The contractor must assist program participants keep current on rent payments, maintain their housing unit, obtain furnishings and appliances, coordinate mental health services, obtain entitlement benefits and other forms of assistance.
Limitations:	• This program is reserved for individuals with a diagnosis of a severe and persistent mental health disorder.
Eligible Housing:	This program provides housing in private market units (any combination of single-family houses, apartments, and condominiums).
Legal Framework:	The provisions of the Home First program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.

TABLE 21:		
	PERMANENT SUPPORTIVE HOUSING OPERATION HOMECOMING	
	Administered by the Montgomery County Coalition for the Homeless, Inc.	
under co	ontract with the County Department of Health and Human Services	
Funding Source:	The PSH - Operation Homecoming Program (OHP) is funded through County General Funds.	
Household Eligibility:	• This program serves vulnerable homeless veteran households (including single adults and families) who meet the definition of "homeless veteran" as defined by the County's Continuum of Care.	
	The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher.	
Income Limits:	Household income must be at or below 30% of AMI.	
Subsidy Amount:	• The subsidy equals the difference between monthly rent cost and 30% of the participant's monthly household income.	
Duration of Benefit:	Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.	
Path of Entry:	Program participants must receive a referral from the County's Coordinated Entry System.	
Supportive Services:	The contractor must provide case management services to support the veteran in maintaining permanent housing as well as obtaining medical care, utility assistance and other forms of assistance.	
Limitations:	This program is limited to veterans who have significant behavioral health, medical, or other barriers that will require ongoing assistance and support.	
Eligible Housing:	The contractor assists eligible veterans lease units from private landlords or from HOC.	
Legal Framework:	The provisions of the Operation Homecoming Program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.	

TABLE 22:

PERMANENT SUPPORTIVE HOUSING SENECA HEIGHTS APARTMENTS Administered by the Montgomery County Coalition for the Homeless, Inc. under contract with the County Department of Health and Human Services

	initiact with the County Department of Health and Human Services
Funding Source:	The PSH - Seneca Heights Apartments program offers personal living quarters (PLQs) funded through a Federal Grant and County General Funds.
	A portion of units in the Seneca Heights Apartments with rent subsidies are funded through Federal Project-based Housing Choice Vouchers.
Household Eligibility:	• Eligibility for units in the permanent supportive housing program at Seneca Heights Apartments is reserved for 40 formerly homeless single adults and families.
	• The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher.
Income Limits:	Subsidy recipients must be single adults with "very low incomes (poverty level)."
Subsidy Amount:	The contract between DHHS and the Montgomery County Coalition for the Homeless specifies that "rent is to be determined on an individual basis for each resident."
Duration of Benefit:	Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.
Path of Entry:	Program participants must receive a referral from the County's Coordinated Entry System.
Supportive Services:	The contractor must provide employment services and assistance in obtaining income supports and health and disability benefits.
Limitations:	The Seneca Heights contract specifies that three-quarters of program slots must be designated for persons with a disability.
Eligible Housing:	This program provides personal living quarters (PLQs, also called efficiency apartments) for single adults at the Seneca Heights Apartments in Gaithersburg.
Legal Framework:	The requirements of the Seneca Heights Apartments permanent supportive housing program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.

TABLE 23: PERMANENT SUPPORTIVE HOUSING CORDELL PLACE Administered by the Montgomery County Coalition for the Homeless, Inc. under contract with the County Department of Health and Human Services		
Funding Source:	The PSH program at Cordell Place offers personal living quarters (PLQs) funded through a Federal Grant and County General Funds.	
	• Eligibility for units in the permanent supportive housing program at Cordell Place is reserved for 32 formerly homeless single adults.	
Household Eligibility:	• The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher.	
	• To be eligible for permanent supportive housing at Cordell Place, a person must have a documented disability.	
Income Limits:	Subsidy recipients must be single adults with incomes at or below 40% of AMI.	
Subsidy Amount:	• The subsidy equals the difference between monthly rent cost and 30% of the participant's monthly household income.	
Duration of Benefit:	Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.	
Path of Entry:	Program participants must receive a referral from the County's Coordinated Entry System.	
Supportive Services:	The contractor must provide employment services and assistance in obtaining income supports and health and disability benefits.	
Limitations:	The Seneca Heights contract specifies that one-quarter of program slots must be designated for chronically homeless adults.	
Eligible Housing:	This program provides personal living quarters (PLQs, also called efficiency apartments) for single adults at Cordell Place in Bethesda.	
Legal Framework:	The requirements of the Cordell Place permanent supportive housing program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.	

TABLE 24:

PERMANENT SUPPORTIVE HOUSING VULNERABLE INITIATIVE PROGRAM Administered by the Montgomery County Coalition for the Homeless, Inc. under contract with the County Department of Health and Human Services

Funding Source:	The PSH – Vulnerable Initiative Program offers scattered site apartments funded
	through County General Funds and the County's Housing Initiative Fund.
Household	 The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 13 or higher.
Eligibility:	All households must meet the HUD Category 1 definition of homelessness.
	To be eligible for this program, a person must have a documented disability.
Income Limits:	• Subsidy recipients must be single adults with incomes at or below 40% of AMI.
Subsidy Amount:	• The subsidy equals the difference between monthly rent cost and 30% of the participant's monthly household income.
Duration of Benefit:	• Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.
Path of Entry:	• Program participants must receive a referral from the County's Coordinated Entry System.
Supportive Services:	The contractor must assist program participants obtain income supports and health and disability benefits. Community nursing services are provided.
Limitations:	The Vulnerable Initiative Program contract specifies that all clients must have significant medical and/or mental health conditions.
Eligible Housing:	The contractor assists program participants lease units from private landlords or from HOC.
Legal Framework:	• The requirements of the permanent supportive housing Vulnerable Initiative Program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.

TABLE 25:

PERMANENT SUPPORTIVE HOUSING CREATIVE HOUSING INITIATIVE PROGRAM Administered by the Montgomery County Coalition for the Homeless, Inc. under contract with the County Department of Health and Human Services

	initiact with the County Department of Hearth and Human Services
Funding Source:	The PSH – Creative Housing Initiative program offers clustered apartments funded through a County Community grant and the County's Housing Initiative Fund.
Household Eligibility:	 The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher. All households must meet the HUD Category 1 definition of homelessness. To be eligible for this program, a person must have a documented disability.
Income Limits:	• Subsidy recipients must be single adults with incomes at or below 40% of AMI.
Subsidy Amount:	• The subsidy equals the difference between monthly rent cost and 30% of the participant's monthly household income.
Duration of Benefit:	Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.
Path of Entry:	Program participants must receive a referral from the County's Coordinated Entry System.
Supportive Services:	The contractor must assist program participants obtain income supports and health and disability benefits and care coordination.
Limitations:	• The Creative Housing Initiative Program contract specifies that ten clients must have a documented mental health diagnosis.
Eligible Housing:	The Creative Housing Initiative Program offers clustered units in the Ashmore in Germantown.
Legal Framework:	The requirements of the permanent supportive housing Creative Housing Initiative Program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.

TABLE 26:

PERMANENT SUPPORTIVE HOUSING HOPE HOUSING

Administered by the Montgomery County Coalition for the Homeless, Inc. under contract with the County Department of Health and Human Services and HUD

Funding Source:	• The PSH - Hope Housing program offers 40 units in three shared houses funded through a Federal Grant and County General Funds.
Household Eligibility:	 The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher. All households must meet the HUD Category 1 or 4 definition of homelessness. Program participants must have a documented disability.
Income Limits:	• Subsidy recipients must be single adults with incomes at or below 40% of AMI.
Subsidy Amount:	• The subsidy equals the difference between monthly rent cost and 30% of the participant's monthly household income.
Duration of Benefit:	• Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.
Path of Entry:	• Program participants must receive a referral from the County's Coordinated Entry System.
Supportive Services:	The contractor must provide support services including assistance with entitlements, employment, and care coordination.
Limitations:	 The Hope Housing contract specifies that chronically homeless adults be prioritized.
Eligible Housing:	This program offers shared living in three houses.
Legal Framework:	• Federally-funded rapid re-housing programs are governed by Federal regulations (24 CFR Part 576).

TABLE 27:

PERMANENT SUPPORTIVE HOUSING KEYS FIRST PROGRAM Administered by the Montgomery County Coalition for the Homeless, Inc. under contract with the County Department of Health and Human Services

Funding Source:	The PSH - Keys First program is funded through a Federal Grant and County General Funds.
Household Eligibility:	 The program serves chronically homeless households (with or without children) for which a household member has a disability including, but not limited to, serious and persistent mental illness, chronic physical health problems, documented substance dependence, and documented disability related to aging. The priority population for this program are homeless individuals or a homeless head of household meeting the HUD definition of "chronically homeless." The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher.
Income Limits:	 Subsidy recipients must be single adults with incomes at or below 40% of AMI.
Subsidy Amount:	The contract between DHHS and the Montgomery County Coalition for the Homeless, Inc., specifies that "rent is to be determined on an individual basis for each client/household and must not exceed 30% of the client's gross monthly income."
Duration of Benefit:	Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.
Path of Entry:	Participants must be referred from the County's Coordinated Entry System.
Supportive Services:	 The contractor must provide support services including clinical assessments, referrals to community resources, and development of housing stabilization plans. The contractor must assure that mental health and employment supportive services are coordinated with public and private providers of similar services. The contractor must assist households acquire basic furnishings (such as beds, mattresses, cookware, etc.)
Limitations:	 Program participants must have qualifying documentation of chronic homelessness.
Eligible Housing:	Program participants receive housing in one- or two-bedroom units in scattered or clustered sites.
Legal Framework:	The provisions of the Keys First program are stipulated in a contract between DHHS and the Montgomery County Coalition for the Homeless, Inc.

	TABLE 28: ERMANENT SUPPORTIVE HOUSING INTERFAITH HOMES Administered by Interfaith Works, Inc. ontract with the County Department of Health and Human Services
Funding Source:	The PSH - Interfaith Homes program is funded through a Federal Grant and County General Funds.
Household Eligibility:	• This program serves 14 chronically homeless adults with a disability including, but not limited to, serious and persistent mental illness, chronic physical health problems, documented substance dependence, and documented disability related to aging. Adults must meet the HUD definition of "chronically homeless."
Income Limits:	• Subsidy recipients must be single adults with incomes at or below 40% of AMI.
Subsidy Amount:	• The contract between DHHS and the Montgomery County Coalition for the Homeless, Inc., specifies that "rent is to be determined on an individual basis for each client/household and must not exceed 30% of the client's gross monthly income."
Duration of Benefit:	Households may continue to receive the subsidy as long as they continue to meet the eligibility criteria.
Path of Entry:	Program participants must be referred from the County's Coordinated Entry System.
Supportive Services:	The contractor must assist residents maintain stable housing including support with medical and psychiatric interventions, as necessary. The contractor also assists residents access income support and other entitlements as well as vocational training.
Limitations:	 DHHS has the right to make direct referrals if space is available. Individuals directly referred by DHHS have precedence over individuals on the program waiting list. Households with children are ineligible for this program.
Eligible Housing:	The contractor assists eligible individuals to lease units from private landlords or from HOC.
Legal Framework:	• The provisions of the Interfaith Homes Program are stipulated in a contract between DHHS and Interfaith Works, Inc.

between DHHS and Interfaith Works, Inc.

TABLE 29: PERMANENT SUPPORTIVE HOUSING BECKY'S HOUSE Administered by the Interfaith Works, Inc. under contract with the County Department of Health and Human Services										
Funding Source:	The PSH program at Becky's House offers personal living quarters (PLQs) funded through County General Funds.									
Household Eligibility:	 Units in the permanent supportive housing program at Becky's House are for women only. Older adults are prioritized. The program is available to households with a Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or higher. Program participants must have a documented disability. 									
Income Limits:	• Subsidy recipients must be single adults with incomes at or below 40% of AMI.									
Subsidy Amount:	• The subsidy equals the difference between monthly rent cost and 30% of the participant's monthly household income.									
Duration of Benefit:	• Individuals may continue to receive the subsidy as long as they continue to meet the eligibility criteria.									
Path of Entry:	 Program participants must receive a referral from the County's Coordinated Entry System. 									
Supportive Services:	The contractor must provide care coordination services.									
Limitations:	Becky's House only serves women and primarily serves older adults.									
Eligible Housing:	This program provides personal living quarters (PLQs, also called efficiency apartments) for single women at Becky's House.									
Legal Framework:	The provisions of the permanent supportive housing program at Becky's House are stipulated in a contract between DHHS and Interfaith Works, Inc.									

are stipulated in a contract between DHHS and Interfaith Works, Inc.

TABLE 30:

RAPID RE HOUSING AND PERMANENT SUPPORTING HOUSING VETERAN'S HOUSING PROGRAM

Administered by Bethesda Cares, Inc.

under contract with the County Department of Health and Human Services

under e	ontract with the County Department of Health and Human Services
Funding Source:	The combined RRH/PSH - Veteran's Housing Program is funded through County General Funds.
Household Eligibility:	• This program serves homeless veteran households who meet the definition of "homeless veteran" (as defined by the County's Continuum of Care).
Income Limits:	A homeless veteran's household is eligible for this program if it lacks sufficient resources to immediately prevent moving to a shelter or obtaining other permanent housing.
Subsidy Amount:	• The subsidy equals the difference between monthly rent costs and 30% of the participant's monthly household income.
Duration of Benefit:	 The subsidy under the RRH portion of this program is time limited to up to 12 months. The subsidy under the PSH portion of this program is not time limited.
Path of Entry:	Program participants must receive a referral from the County's Coordinated Entry System.
Supportive Services:	The contractor must assist program participants obtain and retain permanent housing.
Limitations:	The contractor must comply with habitability standards set by the U.S. Department of Housing and Urban Development.
Eligible Housing:	The contractor must provide five units designated for Rapid Re-housing and seven units designated for Permanent Supportive Housing.
Legal Framework:	The provisions of the Veteran's Housing Program are stipulated in a contract between DHHS and Bethesda Cares, Inc.

Chapter 4: Data Management and Availability

This chapter describes the data management systems, reporting requirements, and data availability for the rent subsidy programs described in Chapter 3.

A. Data Management and Reporting Systems

The County Government and the Housing Opportunities Commission employ a variety of data management and reporting practices to track information about the clients served by rent subsidy programs, the use of program funds, and outcomes achieved by the programs. Many of the data management and reporting standards have been developed under federal requirements as a condition of receiving federal funds.

1. Homeless Management Information System (HMIS)

Federal regulations require local Continuums of Care (CoCs) to develop and manage a Homeless Management Information System (HMIS). HMIS are nationally-standardized and locally-administered data systems used to record and analyze client, service, and housing data for individuals and families who are homeless or at risk of homelessness. HMIS data standards and definitions are published by the U.S. Department of Housing and Urban Development (HUD). Federally-mandated HMIS data elements include:

- client identifiers;
- demographic information;
- veteran status;
- disabling conditions; and
- length of stay information.

DHHS administers the HMIS for the Montgomery CoC. Members of the Montgomery CoC use the HMIS to coordinate prioritization lists of single adults needing homeless services. In 2018, DHHS expanded the use of the HMIS for prioritizing services for families as well. CoCs also use the data entered into an HMIS to capture unduplicated counts of homeless individuals and to report to HUD annually on homelessness and the performance of programs and projects designed to end homelessness. HOC and DHHS rent subsidy programs that receive federal funds to end and prevent homelessness record client, service, and housing data in the Montgomery CoC's HMIS. An October 2017 *Gaps Analysis* commissioned by the Montgomery County Interagency Commission on Homelessness recommended that the HMIS be used for all critical components of the County's homeless services system, including all County prevention and diversion programs, and the Rental Assistance Program (RAP) participants. The *Gap Analysis* identified data on rental assistance program recipients as a "critical component of the system" that should be collected "in order for Montgomery

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²¹ 2017 HMIS Data Standards Manual v1.3, April 2018, U.S. Department of Housing and Urban Development p. iii; retrieved from www.hudexchange.info.

County's homeless system to be in a position to track performance and redeploy resources to prevent and end homelessness."²²

2. Federal Reporting Requirements

HUD makes the submission of annual performance reports a condition of receiving federal Continuum of Care (CoC) funds. HUD requires that CoC fund recipients submit Annual Performance Reports (APR) following the end of their grant operating year. HUD uses the APRs to track the performance of the HUD grants. APRs must include information on bed and unit inventory and utilization; financial information; and performance accomplishments. The APR must report on the total number of year-round beds and units, including the number of beds dedicated for chronically homeless persons. It also must report funds expended during the operating year by budget line item, including: development costs (acquisition, rehabilitation, and new construction), supportive services, the homeless management information system (HMIS), leasing, rental assistance, operations, and administration. The APR must provide a count of the persons served in several categories (race, ethnicity, veteran status, etc.) as well as a count of households served at specific points in time. CoC Program.

3. Other Data and Information Management Systems

HOC and DHHS maintain data and information systems other than the HMIS to collect program and client data. In 2009, DHHS leaders identified 136 information systems in use and found that approximately one third of the agency's clients were accessing three or more of the agency's services, of which rent subsidies are one category. To streamline service delivery, administrators decided to build an integrated case management model. ²⁸In 2017, DHHS launched the Enterprise Integrated Case Management (EICM) system that enables staff to access centralized client records, service delivery history, and concurrent case activity information. ²⁹ The EICM mostly contains demographic and service information on DHHS clients. Development of the EICM is not yet complete and the system does not currently record the amount of housing assistance payments made to rent subsidy program participants.

Data on some rent subsidy programs are maintained in a more informal and non-standardized manner. For example, demographic and financial data for some programs administered by non-profit

www.montgomerycountymd.gov/HHS/Resources/Files/DHHS_OCOO_IT%20eICM%20Brochure.pdf.

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²² Gaps Analysis: Montgomery County Homeless Continuum of Care, Montgomery County Interagency Commission on Homelessness, Oct. 2017, p. 11; www.montgomerycountymd.gov/homelessness/gapanalysis.html.

²³ Source: CoC APR Guidebook: For APRs submitted beginning: April 1, 2017 (p. 1); www.hudexchange.info/resources/documents/sage-coc-apr-guidebook-for-coc-grant-funded-programs.pdf.

²⁴ ibid., p. 6.

²⁵ ibid., p. 7.

²⁶ ibid., p. 38.

²⁷ 24 CFR Part 78, an updated version of the CoC Program interim rule, was published in the Federal Register on April 1, 2017, retrieved from www.gpo.gov/fdsys/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml.

²⁸ Montgomery County, Maryland: Enterprise Integrated Case Management, Sam Gill, Indi Dutta-Gupta, and B. Roach, July 9, 2014; https://datasmart.ash.harvard.edu/news/article/montgomery-county-maryland-enterprise-integrated-case-management-487.

²⁹ Montgomery County Department of Health and Human Services, *Technology Modernization Enterprise Integrated Case Management System* (brochure); retrieved from

organizations under contract with the County Government are stored solely in files and spreadsheets maintained by DHHS program managers.

B. HOC Program Reporting Requirements and Data Availability

The Housing Opportunities Commission administers Federal and local rent subsidy programs.

• Housing Choice Voucher (HCV) Programs: HOC administers several federally-funded rent subsidy voucher programs including: Tenant-Based HCVs, Project-Based HCVs as well as vouchers allocated for Veterans Affairs Supportive Housing and Non-Elderly Disabled Housing.

<u>Reporting Requirements</u>: HUD requires that Public Housing Authorities (including HOC) annually submit a range of data related to HCV programs. As mandated by federal regulation, HOC collects and reports:

- Demographic and financial information about each household that receives assistance;
- Information about the location, size, type, and ownership of dwelling units housing the voucher recipients; and
- Rent expenditure information including the total monthly rent payable to the unit owner, the monthly amount paid by the tenant, and the amount of the housing assistance payments.

<u>Data Availability</u>: HOC is readily able to retrieve data about HCV households, dwelling units, and housing assistance payments. In addition, HOC publishes Housing Choice Voucher statistics and fiscal information in its Annual Operating Budget and Comprehensive Annual Financial Report.

 McKinney-Vento Rent Supportive Housing Program: HOC administers this federally-funded program that provides rent subsidies to formerly homeless persons with a documented disability.

Reporting Requirements: HUD requires that McKinney-Vento Rent Supportive Housing Program administrators work with the local Continuum of Care to maintain data in a HMIS in accordance with HUD's data collection, management, and reporting standards. Mandated HMIS data elements include client identifiers, demographic information, veteran status, disabling conditions, and length of stay information.

<u>Data Availability</u>: HOC complies with HUD data collection, management, and reporting standards and is readily able to retrieve data about McKinney-Vento Rent Supportive Housing Program households, dwelling units, and housing assistance payments.

• **Rent Supplement Program**: HOC administers this program that provides rent subsidies to County residents with a gross household income of between 20% and 40% of AMI who do not receive any form of federally-funded housing assistance.

<u>Reporting Requirements</u>: HOC receives funding for the Rent Supplement Program from the County's Housing Initiative Fund (HIF). A memorandum of understanding (MOU) between the

HOC and the County's Department of Housing and Community Affairs (DHCA) sets conditions on the use of HIF funds. One of the MOU conditions specifies that "HOC will submit on a quarterly basis a Program Report including program enrollment information (e.g., participant demographic information), total expenditures and projected funding need for the subsequent quarter."

<u>Data Availability</u>: HOC complies with the MOU reporting requirement and submits quarterly Rental Supplement Program reports to DHCA. These reports include detailed data on the monthly rents paid by tenants, monthly rent subsidy amounts, tenant income, household size, and other demographic information.

Community Choice Homes, Youth Bridge, and Move Up Initiatives: HOC administers these
programs that target specific populations that need assistance in order to obtain or retain rental
housing.

Reporting Requirements: HOC receives funding for the Community Choice Homes, Youth Bridge, and Move-Up Initiatives from the County's Housing Initiative Fund (HIF). A memorandum of understanding (MOU) between the HOC and the County's Department of Housing and Community Affairs (DHCA) sets conditions on the use of HIF funds. The MOU does not include any reporting requirements for these three programs.

<u>Data Availability</u>: HOC collects demographic, income, and housing assistance payment data for these programs.

C. County Government Program Reporting Requirements and Data Availability

DHHS' Division of Public Health Services is responsible for local administration of a federally-funded housing voucher program to serve residents diagnosed with HIV/AIDs.

• Housing Opportunities for Persons with AIDS: The Housing Opportunities for Persons with AIDS (HOPWA) program provides housing choice vouchers to persons who are diagnosed with HIV/AIDS (or a related disease).

<u>Reporting Requirements</u>: As with other federally-funded voucher programs, HUD requires that local administrators of HOPWA submit a range of data including demographic and financial information about each household that receives assistance as well as housing unit characteristics and housing assistance payment amounts.

<u>Data Availability</u>: DHHS is readily able to retrieve data about HOPWA households, dwelling units, and housing assistance payments.

As detailed in Section 3, DHHS's Division of Services to End and Prevent Homelessness administers a rental assistance program established in County law.

• **Rental Assistance Program**: DHHS administered the County's Rental Assistance Program using dollars allocated from the County's Housing Initiative Fund.

Reporting Requirements: The County Code stipulates that "The County Executive during the budget process must report to the County Council on the Rental Assistance Program [...]. In the operating budget submitted annually to the Council, the Executive must review Rental Assistance Program and Handicapped Rental Assistance Program benefit levels and must propose any adjustment necessary to achieve the goals of each program." During the Council's annual budget review, the Executive submits information on the number of clients served by the Rental Assistance Program, but has not transmitted a review of program benefit levels.

<u>Data Availability</u>: DHHS staff maintain internal records on spending for Rental Assistance Program housing assistance payments and the monthly average number of households that receive the subsidy payments. In addition, DHHS collects demographic information about program participants (but not those on the program waitlist).

DHHS contracts with non-profit organizations that provide Rapid Re-housing and Permanent Supportive Housing programs that include rent subsidies.

• Rapid Re-housing / Permanent Supportive Housing Programs: DHHS administers (directly or via contract) 18 distinct separate Rapid Re-housing and Permanent Supportive Housing programs. The array of programs targets different populations (veterans, people with disabilities, youth, seniors, etc.) and income levels.

<u>Reporting Requirements</u>: Most of DHHS' contracts with non-profit organizations include data reporting provisions. For most contracts (including all Housing Initiative Program contracts), the contractor must enter client demographic information in the HMIS.

Many contracts also include provisions requiring the contractor to submit periodic (i.e., monthly, bi-annual, or annual) reports on the number of individuals or families entering and exiting the program as well as length of stay data. These contracts do not stipulate that contractors submit data on the actual amount expended for rent subsidies (as distinct from other expenditure categories such as case management services). Some contractors provide DHHS select client demographic and housing subsidy data when submitting invoices for payment.

<u>Data Availability</u>: For programs in which the contract requires the contractor to enter information into the HMIS, DHHS may access client demographic information such as age, race/ethnicity, gender, and household composition. HMIS data also include information on clients' income sources, access to health insurance, veteran status, and disability status. Of note, the HMIS is not designed to track rent subsidy expenditures or other fiscal data on assistance provided to clients.

Several permanent supportive housing programs receive funding from multiple federal, State of Maryland, County, and non-public sources. At present, the County's budgeting and accounting

³⁰ County Code, Sections 41A-15.

systems are not capable of producing reports that consolidate program data across funding sources. As such, DHHS staff cannot readily retrieve certain program-specific expenditure data, including housing assistance payments, for some permanent supporting housing programs.

The DHHS Division of Services to End and Prevent Homelessness recently began an effort to improve its data management and analysis capabilities. Division staff are working to create a centralized data repository that merges demographic information with expenditure data across programs. At present, however, no common data collection and management practices exist across all housing assistance programs. While some program managers collect data on rent subsidies and related measures, this information currently is dispersed and is difficult to consolidate into an integrated multi-program report.

D. Summary of HOC and County Government Program Data Availability

Tables 31 and 32 provide a summary of the data that is readily available for the 30 rent subsidy programs listed in Chapter 3. Table 31 presents the data available for HOC-administered programs, and Table 32 presents the data available for DHHS-administered programs. As discussed above, data reporting requirements differ among programs. OLO found multiple gaps in the data readily available for some DHHS-administered programs.

Table 31: HOC-Administered Rent Subsidy Programs: Data Availability

Demographic Special Circumstances Income Housing										ing Assis		
Program			Infor	mation	Specia	i Circuiis	tances	income				
				Avg. No.					Avg.	Avg.	Avg.	
				of	%	% with		Median	Monthly	Monthly	Monthly	Avg.
		Number of	Avg.	Persons	Formerly	Disabling	%	НН	HAP -	HAP -	HAP -	Length
		Subsidies	Age	in HH	Homeless	Condition	Veteran	Income	PLQ	1BR	2BR	of Stay
Housing Choice Project-based		702 (CY 2018)	34	2.1	6%	29%	0%	\$13,397	\$773	\$983	\$1,085	1.5 yrs
(HCV)	Tenant- based	5,660 (CY 2018)	31	2.3	2%	27%	0%	\$14,256	\$880	\$1,022	\$1,124	8 yrs
Non-elderly Persons with Disabilities (NED) vouchers		625 (CY 2018)	43	1.5	1%	100%	0%	\$12,188	\$716	\$824	\$1,171	12 yrs
Veterans Affairs Supportive Housing (VASH) vouchers		79 (CY 2018)	39	1.7	14%	19%	100%	\$13,164	\$1,059	\$1,022	\$1,039	5 yrs
McKinney-Vento Supportive Housing Program		197 (CY 2018)	52	1.5	100%	100%	2%	\$8,182	Data unavailable	\$1,266	\$1,474	5 yrs
Rent Supplement Program		305 (FY 2018)	55	2	Data unavailable	Data unavailable	Data unavailable	\$25,689	Data unavailable	\$472	\$499	2 yrs
Community Choice Homes Initiative		8 (FY 2018)	50	1	Data unavailable	100%	Data unavailable	\$10,272	Data unavailable	\$1,250	\$1,641	1 yr
Move-Up Initiative		8 (FY 2018)	50	1	100%	Data unavailable	Data unavailable	\$15,648	Data unavailable	\$1,025	\$1,588	1 yr
Youth Bridge Initiative		5 (FY 2018)	21	1	Data unavailable	Data unavailable	Data unavailable	\$3,475	Data unavailable	\$1,348	NA	1 yr
HH = Household; HAP = Housing Assistance Payment; PLQ = Personal Living Quarters; NA = Category is not applicable to this program.												

Table 32: DHHS-Administered Rent Subsidy Programs: Data Availability

NCCF: Young Adult 21	Program			Demographic Information				Special Circumstances			Income	Income Housing Assistance Payments					
Rental Assistance Program 1,720			of	Avg. Age	Head of	Avg. Age:	of Persons	Formerly	Disabling		HH Income	Monthly HAP -	Monthly HAP -	Monthly HAP -	Avg. Monthly HAP	Avg. Length of Stay	
Rental Assistance Program 1,720 unavailable unavailable unavailable unavailable 2.3 3% unavailable 1% \$23,097 \$195 \$	HOPWA		64	47			2	0	100%	0	<u>≤</u> 30% of		\$902	\$1,006	Data unavailable	24-36 months	
Rapid Reculting Catholic Charities	Rental Assistance Program		1,720				2.3	3%		1%	\$23,097	\$195	\$195	\$195	\$195	Data unavailable	
Rapid Re- Catholic Charities		DHHS	105		32	47	2.52	100%	16%	1%	\$11,338				\$818	200 days	
NCCF 20		Catholic Charities						100%							Data unavailable	457 days	
Head of HH	_	NCCF	20		30.7		4.09	100%	1%	0%					Data unavailable	359 days	
Program			21		23.2		2.9	100%	5%	0%					Data unavailable	Data unavailable	
PPH1			400		32	49	1.97	100%	41%	1%	\$7,704	\$1,183	\$1,414	\$1,555	Data unavailable	Data unavailable	
PPH2		PPH1			36	46	2.85	100%	18%	0%					Data unavailable	Data unavailable	
Permanent Supportive Housing (PSH) Permanent Supportive Housing (PSH) Responsible Pace The paragraph of the properties of the propertie		PPH2			38	50	2.7	100%	19%	1%					\$1,408	Data unavailable	
Permanent Supportive Housing (PSH) Vulnerable Initiative Hope Housing Keys First 28 Data unavailable Joata unavailable J		Home First	30	52	52	52	1	100%	100%	3%					Data unavailable	Data unavailable	
Permanent Supportive Housing (PSH) Cordell Place Data unavailable unavailabl		^		unavailable	38	unavailable	1.4	100%	63%	73%	unavailable	unavailable			Data unavailable	Data unavailable	
Cordell Place Unavailable S5 S5 S5 S5 S5 S5 S5 S		Seneca Heights			33		3.08	100%	17%	0%			NA	NA	Data unavailable	Data unavailable	
Vulnerable Initiative 15 55.7 55.7 55.7 1 100% 100% 11% unavailable unavailabl	* *	Cordell Place		55	55	55	1	100%	38%	11%			NA	NA	Data unavailable	Data unavailable	
Initiative unavailable 53 53 53 53 1 100% 65% 0% unavailable unava	(PSH)	Vulnerable Initiative	15	55.7	55.7	55.7	1	100%	100%	11%					Data unavailable	Data unavailable	
Hope Housing 50 unavailable 45.5 53.6 1.19 100% 95% 5% unavailable				53	53	53	1	100%	65%	0%					Data unavailable	Data unavailable	
Keys First 28 unavailable 43 46 1.12 100% 97% 0% unavailable unava		Hope Housing	50		45.5	53.6	1.19	100%	95%	5%					Data unavailable	Data unavailable	
Interfaith Homes 31 56 56 56 1 100% 94% 3% unavailable unavailable unavailable unavailable unavailable		Keys First	28		43	46	1.12	100%	97%	0%					Data unavailable	Data unavailable	
		Interfaith Homes	31	56	56	56	1	100%	94%	3%					Data unavailable	Data unavailable	
Becky's House Data Unavailable 64.2 64.2 64.2 1 100% 100% 0% Data Unavailable		Becky's House	Data unavailable	64.2	64.2	64.2	1	100%	100%	0%	Data unavailable	Data unavailable	Data unavailable	Data unavailable	Data unavailable	Data unavailable	
RRH/PSH Veteran's Housing Program 12 Data unavailable 49.9 Data unavailable 1.38 100% 36% 73% Data unavailable Unavailable unavailable unavailable unavailable	RRH/PSH		12		49.9		1.38	100%	36%	73%					Data unavailable	Data unavailable	

Chapter 5: Findings and Recommendations

This chapter summarizes the major findings of this report and presents recommendations to the County Council from the Office of Legislative Oversight (OLO).

A. Summary of Major Findings

OLO has identified four major findings from the preparation of this report.

Finding #1: No fewer than 29 distinct rent subsidy programs are administered in Montgomery County. These programs range in size from large federally-funded programs administered locally by the Housing Opportunities Commission that serve thousands of households to small programs operated by local non-profit organizations under contract to the Department of Health and Human Services that serve fewer than a dozen individuals. The various subsidy programs target different populations and offer varying levels of assistance.

Chapter 3 of this report presents an inventory of 29 distinct rent subsidy programs administered in Montgomery County. Each program in the inventory is administered either by the Housing Opportunities Commission (HOC) or by the County Department of Health and Human Services (DHHS). However, many DHHS-administered programs are implemented through contracts with non-profit organizations. The largest programs provide subsidies to several thousand households; the smallest programs serve fewer than a dozen clients.

Funding sources vary greatly among the programs in the inventory. Federal dollars cover all rent subsidy costs (also known as "housing assistance payments") for some programs, such as the Housing Choice Voucher program, the largest rent subsidy program in the County. Other programs are funded entirely by local dollars, in many cases from the County's Housing Initiative Fund. Still other programs receive a combination of Federal and County funding with some also receiving supplemental support from the State of Maryland.

The inventory includes programs with different target populations. Some programs generally serve low-income households with eligibility linked to household income as a percent of the local average median income. Some programs target population subgroups such as veterans, persons with disabilities, seniors, and the formerly homeless. Moreover, some programs solely offer rent assistance while others combine rent subsidies with supplemental supportive services.

The amount of the rent subsidy also varies among the programs. Many programs scale the subsidy amount to household income. In these programs, the subsidy amount is set to assure that the tenant pays no more than 30 percent of household income on rent. Other programs offer subsidies at fixed dollar amounts. Most notably, the Rental Assistance Program administered by DHHS limits subsidies to \$200 per household per month as stipulated in the County Code.

Many of the variable provisions among the locally-funded rent subsidy programs are within the control of the Council. Federally-funded programs must abide by federal rules and regulations, but the Council has the authority to change policy and funding decisions for locally-funded programs.

Finding #2: Despite a multiplicity of entities working to reduce and prevent homelessness, these organizations have successfully teamed together to coordinate services and consolidate program data, and they can serve as a model for rent subsidy programs.

The same organizations that offer rent subsidies are also involved in programs to reduce and prevent homelessness. These organizations have developed systems to coordinate their services in Montgomery County and to collect consolidated and comparable data across their programs.

As detailed in Chapter 2, a partnership of public and private groups in Montgomery County has established a Montgomery County Continuum of Care (CoC) to comply with federal funding requirements. The Montgomery County CoC is a local planning network that coordinates programs to prevent and reduce homelessness. The governing board for the Montgomery CoC is the Montgomery County Interagency Commission on Homelessness (ICH). The ICH is comprised of representatives from the County Government, HOC, municipalities, the Montgomery County Public Schools, non-profit service providers, citizens, and others who have a role in the County's affordable housing initiatives. The ICH submits a single comprehensive application to HUD for federal homelessness prevention funding.

As required by HUD, the Montgomery County CoC employs a Coordinated Entry System (CES) to link homeless people with the housing services best suited to their needs. HUD requires the CES to standardize the assessment and referral processes for potential program participants. Through the CES, each participating organization makes referrals using the same decision-making processes, independent of how a client first accesses the system. In addition, the Montgomery County CoC manages a Homeless Management Information System (HMIS). The HMIS is a nationally-standardized and locally-administered data system used to record and analyze client, service, and housing data for individuals and families who are homeless or at risk of homelessness. The CoC uses the HMIS to coordinate prioritization lists of residents needing homeless services and to produce an unduplicated count of homeless individuals and families.

The County Continuum of Care demonstrates that diverse service providers can successfully work together to coordinate program entry, service delivery, and data management.

Finding #3: No common standards govern data management across all rent subsidy programs. Different programs maintain different sets of demographic and financial data. Demographic and financial data are not readily available for several rent subsidy programs.

At present, however, the rent subsidy programs have no common data collection and management practices. As mentioned above, several rent subsidy programs report client data in the County's HMIS. But the HMIS is not designed to track rent subsidy expenditures or other fiscal assistance to clients. Data for many of the rent subsidy programs are stored outside of the HMIS. An October 2017 *Gaps Analysis* commissioned by the ICH recommended that the HMIS be used for all critical components of the County's homeless services system, including data on Rental Assistance Program participants.

Many of the DHHS-administered rent subsidy programs collect client data in the Department's new Enterprise Integrated Case Management (EICM) system. The EICM contains demographic and service information on DHHS clients as well as information on the amount of housing assistance payments for certain programs. However, EICM does not include housing assistance payment information for many programs operated by non-profit contractors. Of note, the HMIS and the EICM are separate data management systems with limited ability to merge data.

In addition, demographic and financial data for some programs administered by non-profit organizations under contract with the County Government are stored solely in files and spreadsheets maintained by DHHS program managers. While DHHS program managers collect data on rent subsidies and related measures, this information currently is dispersed and is difficult to consolidate into an integrated multi-program report.

Several permanent supportive housing programs receive funding from multiple federal, State of Maryland, County, and non-public sources. At present, the County's budgeting and accounting systems cannot produce reports that consolidate program data across funding sources. As such, DHHS staff cannot readily retrieve certain program-specific expenditure data, including housing assistance payments, for some permanent supporting housing programs.

Finding #4: While a coordinated entry system exists for the federally-funded homelessness programs, no similar coordinated entry approach is in place for the array of rent subsidy programs.

As described about, the County's CoC has established a coordinated entry system (CES) for homelessness reduction and prevention programs. Some rent subsidy programs accept entry wholly or partially through the current CES; other programs operate separately from the CES. Separate paths of entry and waiting lists exist for programs outside the CES. For example, HOC operates an online portal for residents to apply for most HOC-administered rent subsidy programs, but the portal does not provide access to DHHS-administered programs.

B. OLO Recommendations

Based on the above findings, OLO presents the following three recommendations to the County Council.

Recommendation #1: OLO recommends that Council review the inventory of rent subsidy programs presented in this report to better understand the array of rent subsidies available to County residents and to inform Council policy and budget decision-making.

The inventory of rent subsidy programs is intended to help Councilmembers and the community better understand the assortment of rent subsidy programs administered in the County. These programs are administered by different organizations, target diverse populations, offer varied subsidy amounts, and receive funding from multiple sources. Outside this report, no current compendium of the rent subsidy programs administered in the County is available.³¹

This report consolidates information about 29 distinct programs, offering the Council an opportunity to review each program's provisions including: eligibility criteria, income limits, subsidy amounts, and funding source. The program inventory in this report will allow the Council to view the entire array of rent subsidy programs, compare program elements, and identify potential gaps in assistance. Information of this sort can be useful when the Council considers affordable housing policies and allocates resources through the budget process.

For example, the Rental Assistance Program administered by the Department of Health and Human Services (DHHS) offers a fixed maximum benefit of \$200 a month, an amount stipulated in the County Code that has remained unchanged since the Year 2000. In contrast, most other programs described in this report offer subsidy amounts that are tied to household income and fair market rental costs. In light of this difference, the Council may wish to consider amending the provision of the Code that sets the maximum subsidy level for the Rental Assistance Program. Upon review of the program inventory, Councilmembers may identify additional policy and budgeting questions for consideration.

However, a comprehensive policy and fiscal review of the inventory of rent subsidy programs – and whether these programs leave gaps in service -- requires a complete set of demographic and financial data for each program. As detailed in Chapter 4 of this report, basic demographic and financial data are not readily available for several rent subsidy programs. These data gaps are the basis for the next OLO recommendation.

³¹ Prior to this report, the most recent compendium of rent subsidy programs administered in Montgomery County was provided in OLO Report 2010-9, *An Inventory and Assessment of Housing-Related Programs: Department of Housing and Community Affairs, Department of Health and Human Services, and Housing Opportunities Commission*, by S. Richards (Office of Legislative Oversight, Montgomery County Council, released April 6, 2010); www.montgomerycountymd.gov/OLO/Reports/CurrentOLOReports.html.

Recommendation #2: The Council should ask the County Executive to convene an interagency group to develop a plan for an integrated data management system for all rent subsidy programs.

At present, rent subsidy program data are dispersed among multiple data management systems and no common data collection practices exist across all programs. As a result, data from these programs cannot be readily collected, compared or evaluated. The absence of a consolidated data repository hinders assessment of how the current array of programs collectively address the changing needs of the County population. Furthermore, the lack of consistent data across all programs hampers the Council's capacity to compare the performance of different programs and to make informed decisions on how to allocate limited County resources.

To remedy this situation, OLO recommends that the Council ask the County Executive to convene an interagency group to develop a plan for an integrated rent subsidy program data management system. The system would incorporate consistent data fields from each program and would allow for data sorting to produce information that would support program review and oversight. Examples of the type of data the system should be able to produce include:

- the average per month expenditures for rent subsidies by program and by housing unit size;
- the total annual expenditures for rent subsidy payments by funding source;
- the total number of households receiving rent subsidies across all programs by income range;
- the average duration of rent subsidy payments per household by program; and
- the total number of households receiving rent subsidies by population subgroups (e.g., veterans, persons with disabilities, seniors).

Information of this sort would inform the Council and other stakeholders on how County funding is being spent and where there may be gaps in coverage.

The system could be a stand-alone database or combined with other data systems such as the HMIS that serve related housing and human services programs. Given the ICH's role as the governing body of the County's Continuum of Care, the ICH would be a logical group to oversee development of the data management system.

OLO acknowledges that the creation of a data management system is not a simple task. Rather, OLO suggests that the first step must be development of a plan to identify necessary modifications to business practices, accounting and budgeting guidelines, procurement rules, and information technology needed to develop an integrated data management system. In addition, the plan should establish guidelines for data collection including establishing common definitions and methods for sorting comparable data across all programs.

OLO recommends that the Council ask the County Executive to convene an interagency group to develop a plan and identify the resources necessary to implement the plan. The group should consist of rent subsidy program managers as well as information technology specialists. OLO suggests that the interagency group should report back to the Council by the end of Calendar Year 2019 on its planning

work to establish an integrated data management system for all rent subsidy (and possible other related) programs. At that time, the group should identify resources that would be needed to develop the data management system and propose a timeline for implementation.

Recommendation #3: The Council should ask the County Executive to convene an interagency group to develop a coordinated entry system for all rent subsidy programs.

As a corollary to the previous recommendation, OLO recommends that the Council ask the County Executive to convene an interagency group to develop a coordinated entry system for all rent subsidy programs available to County residents. Logically, the rent subsidy entry system would share data with the Coordinated Entry System for homelessness programs as well as with HOC's Housing Path online portal. Alternatively, the HOC portal could be expanded to allow entry into rent subsidy programs administered by DHHS.

As with the development of the integrated data management system, creation of a coordinated entry system for rent subsidy programs would require interagency cooperation and planning. Here, too, OLO suggests that the ICH, working in coordination with the County Department of Technology Services, would be a reasonable group to undertake this task.

OLO recommends that the interagency group designated by the County Executive report by the end of Calendar Year 2019 on the steps that would be needed to coordinate entry across all rent subsidy programs including identification of needed resources and a timeline for implementation.

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Chapter 6: Agency Comments

The Office of Legislative Oversight circulated a draft of this report to the County Government and the Housing Opportunities Commission. Written comments from the Chief Administrative Officer begin on the next page.



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

Andrew W. Kleine Chief Administrative Officer

MEMORANDUM

April 29, 2019

TO:

Chris Cihlar, Director, Office of Legislative Oversight

FROM:

Andrew Kleine, Chief Administrative Officer AWK

SUBJECT:

OLO Draft Report 2019-4

Inventory of Rent Subsidy Programs in Montgomery County

Thank you for the opportunity to comment on the Office of Legislative Oversight's (OLO) Draft Report 2019-4: Inventory of Rent Subsidy Programs in Montgomery County. The report is a comprehensive inventory of Montgomery County's programs that provide financial assistance to renters who are at risk of becoming homeless or to assist renters who are paying too large a percentage of their income for rent. These programs assist some of the most vulnerable residents of Montgomery County, and are some of the key initiatives in the County that address problems of housing affordability and homelessness.

This summary of the County's rental subsidy programs provides an opportunity to see how the various programs work together and to understand the different types of households being served. We agree with the report's four major findings.

Below are our responses to the three recommendations outlined in the report:

Recommendation #1:

OLO recommends that Council review the inventory of rent subsidy programs presented in this report to better understand the array of rent subsidies available to County residents and to inform Council policy and budget decision-making.

CAO Response:

This report is an important first step in increasing the knowledge and understanding of County rent subsidy programs. We also acknowledge the list of rent subsidy programs in this report is not exhaustive of all housing programs in the County.

Recommendation #2:

The Council should ask the County Executive to convene an interagency group to develop a plan for an integrated data management system for all rent subsidy programs.

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montgomerycountymd.gov/311 Maryland Relay 711

Chris Cihlar, Director, Office of Legislative Oversight April 29, 2019 Page 2

CAO Response:

We agree with this recommendation. DHHS has invested in new programs and procedures to improve data collection and reporting among most programs that either receive DHHS-administered funds or that utilize the federal Homeless Management Information System (HMIS). In addition, the Interagency Commission on Homelessness already oversees a coordinated entry system that allows for common views of homeless clients getting or needing services. That experience can be leveraged into the area of rent subsidies, starting first with DHHS programs and over time adding agencies such as DHCA and HOC.

Recommendation#3:

The Council should ask the County Executive to convene an interagency group to develop a coordinated entry system for all rent subsidy programs.

CAO Response:

The report lists the many rent subsidy programs that operate in Montgomery County.

Greater coordination between programs is important. We are not sure at this time if the guidelines for the federally-funded programs will allow the system for selecting participants to be changed. This will require further research. However, County-funded programs such as the Rental Assistance Program and the Rent Supplement Program could be coordinated through the homeless continuum.

If the entry system for rent subsidy program is revised, DHCA recommends that options be provided for emergency assistance to households facing a housing crisis such as an emergency eviction, or the loss of their unit due to condemnation or some other governmental action. These households often do not need social services, but they do have a housing crisis that requires financial rent assistance. If a single point of entry system to track all voucher-holders is to be established, we should consider expanding the entry system to include households facing eviction and receiving emergency rental assistance.

Thank you for the opportunity to review the draft report and present our comments.

AK:tjg

cc: Fariba Kassiri, Deputy Chief Administrative Officer Caroline Sturgis, Assistant Chief Administrative Officer Timothy Goetzinger, Acting Director, DHCA Victoria Buckland, Acting Director, HHS Stacy Spann, Executive Director, HOC