

7.8 CoC Housing Program Termination

PURPOSE

The purpose of this policy is to establish clear guidelines for the termination of Coordinated Entry System(CES) participants, in alignment with the Housing First model set forth by HUD. The policy emphasizes the importance of communication, case conferencing, and the use of good judgment when considering program termination. It ensures that all efforts are made to resolve issues before termination and outlines the necessary steps and documentation required when termination is unavoidable.

FORMS

Appendix J CoC Housing Program Termination Form

POLICY

All programs have agreed to participate in CES and follow the Housing First model set forth by HUD. Anytime a PSH program termination is being considered, it is required that the housing program to communicate any issues with the CES facilitator, and case conference in routine meetings, in order to tackle barriers and find solutions. It is the responsibility of the program to exercise good judgment and examine all extenuating circumstances in determining when program violations are serious enough to result in termination from the program.

Rental assistance payments can only be made for units that pass the Department of Housing and Urban Development Housing Quality Standards within 30 days of an initial and annual inspection. Failure to comply with the federal regulations of the program will result in termination from the program. Per the federal regulations, clients must:

- Receive an annual assessment of needs; and
- Provide all required documentation to verify program eligibility initially and as changes occur.

Termination will also occur if the qualified member of the household:

- Is institutionalized or incarcerated for 90 days or more;
- Moves out of the service area;
- Voluntarily exits the program; or
- Dies.

Clients must be provided a written copy of the program rules and the termination process upon entry into the program. Clients who repeatedly and/or seriously violate program rules or their lease may be terminated from the program. In the spirit of the supportive aspects of the program, the participating agency will document reasonable efforts and interventions that demonstrate attempts to encourage clients' compliance with program rules and expectations. In some severe cases, (e.g. violence, or serious threats of violence, toward program staff, volunteers, or other clients), termination from the program may be immediate.

Clients participating in ESG or CoC funded RRH programs may also be terminated from the program if they do not meet program requirements, but that does not mean that their lease is terminated. ESG RRH programs require clients to have income below 30% AMI and must participate in monthly home, and if clients do not meet these requirements they may be terminated from the program but continue to hold their lease with the landlord.

When termination is necessary, the client will be provided notice that clearly states the reason for termination. The agency will also provide the CE facilitator with a "Termination of Program Client" form, outlining specifics of why the client is being terminated to determine their rehouse eligibility and/or prioritization. The program must deliver all termination-related notices in writing. A client is able to file a grievance with Coordinated Entry if a client feels they have been wrongly terminated from a program. Notice of the final decision will be provided to the client in a timely manner. The termination process must be consistent with federal regulations and agency policy.

KEY TAKE AWAYS

- **Communication and Collaboration:** Before terminating a client from a Permanent Supportive Housing (PSH) program, it is mandatory for the program to communicate with the Coordinated Entry System (CES) facilitator and participate in weekly case conferences to address and resolve any issues that may lead to termination.

- **Adherence to Federal Regulations:** Clients must comply with federal regulations, including passing Housing Quality Standards inspections and providing required documentation to maintain program eligibility. Failure to comply with these standards will result in termination. Specific conditions, such as incarceration, institutionalization

for 90 days or more, moving out of the service area, voluntary exit, or death, also necessitate program termination.

- **Termination Criteria and Process:** Clients who seriously or repeatedly violate program rules or their lease may be terminated from the program. However, programs must demonstrate that they have made reasonable efforts to help clients comply with program expectations. In cases of severe violations, such as violence or serious threats, immediate termination may be warranted.
- **Notification and Documentation:** Clients must be provided with a written copy of program rules and the termination process upon entry into the program. When termination is necessary, the program must deliver written notice to the client and provide a “Termination of Program Client” form to the CE facilitator, outlining the reasons for termination.
- **Supportive Approach:** The policy reinforces the importance of a supportive approach, with programs expected to document interventions and efforts to encourage client compliance before resorting to termination.

This policy ensures that all program terminations are handled with care, fairness, and in compliance with the Housing First principles, prioritizing client support and stability whenever possible.