

Title: 1.6 Program Termination

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Reviewed By: CE Ad Hoc Committee

Approved By:

Date Approved:

Individuals CE Program Termination

All programs have agreed to participate in Coordinated Entry and follow the Housing First model set forth by HUD. Anytime a PSH program termination is being considered, it is required that the program communicate any issues with the CE Lead Agency, and case conference in the bi-weekly meeting as well as participate in the supportive CoC workgroups and CoC committees, 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 (24 CFR 982.401) 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 regulations¹, clients must:

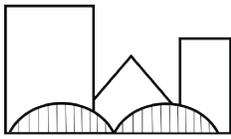
- Receive an annual assessment of needs; and
- Provide all required documentation to verify program eligibility initially and as changes occur.

Termination will also occur if the qualifying 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 the terms of 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,

¹ Title 24 CFR 578.91. (2013). *Termination of assistance to program participants*. Retrieved from: https://ecfr.io/Title-24/se24.3.578_191



or serious threats of violence, toward program staff, volunteers, or other clients), termination from the program may be immediate. Additional eviction policies and procedures, including eviction for non-payment of rent, criminal activity, violence, and abandonment or hospitalization can also be found in Section 1.6.1.

Individuals 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 to participate in monthly home. If clients do not meet these requirements they may be terminated from the program but continue to hold their lease with the landlord. Eviction prevention strategies, outlined in Section 1.6.1, may be utilized by RRH providers to help clients prevent evictions and help with conversations with landlords.

When termination is necessary, the client will be provided notice that clearly states the reason for termination. The agency will also provide the CE Lead Agency with a "Termination of Program Client" form (found in the Appendix) that outlines 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, as outlined in Section 1.8, 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.

Family CE Termination

MIFA may terminate assistance to a program participant who violates the program requirement of granting the Family Housing Advocate one home visit for each month a rental stipend is provided. MIFA may resume assistance to a program participant whose assistance was previously terminated if the situation is corrected. In terminating assistance to a program participant, MIFA must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law.

In addition, a family may no longer be eligible to receive Rapid Rehousing rental assistance if other circumstances occur that violate MIFA's specific policies outlined when orienting the client to its program requirements.