

RESOLUTION NO. 2017-02

Approve CIHA VASH Policies and Procedures

WHEREAS, the Colville Indian Housing Authority is the duly constituted Housing Authority for the Confederated Tribes of the Colville Reservation, established by the Colville Business Council pursuant to the authority of the Constitution of the Colville Confederated Tribes, and in particular Article V, Section 1(a); and,

WHEREAS, the authorities and responsibilities of the Colville Indian Housing Authority are set out in the Colville Tribal Housing Authority Ordinance, adopted by Resolution 1977-59 of the Business Council; and,

WHEREAS, the purposes for which the Colville Indian Housing Authority was established include: (1) remedying unsafe and unsanitary housing conditions that are injurious to the public health, safety, and morals; (2) alleviating the acute shortage of decent, safe, and sanitary dwellings for persons of low income; and (3) providing employment opportunities through the construction, reconstruction, improvement, extension, alteration or repair and operation of low income dwellings; and,

WHEREAS, the Colville Indian Housing Authority has been designated as the "Tribally Designated Housing Entity" for the Confederated Tribes of the Colville Reservation, as that term is defined at Section 4(21) of the Native American Housing Assistance and Self-Determination Act of 1996, P.L. 104-330 (25 U.S.C. 4101 - 4212), as amended ("NAHASDA"); and,

WHEREAS, the Business Council has appointed a Board of Commissioners to manage the Colville Indian Housing Authority (the "Board"), which Board operates pursuant to a Constitution and By-laws enacted by the Board on August 10, 2004 (as amended); and,

WHEREAS, the CIHA was awarded 20 HUD vouchers to assist native veterans living on or near the Colville Indian Reservation.

WHEREAS, the Board of Commissioners determined that there is a need for this CIHA VASH program.

WHEREAS, the CIHA VASH Policies and Procedures defines program participant eligibility and ineligibility for consideration of the CIHA VASH program operated by the housing authority; and

NOW THEREFORE BE IT RESOLVED, the Board of Commissioners hereby approves the proposed CIHA VASH Policies and Procedures; and

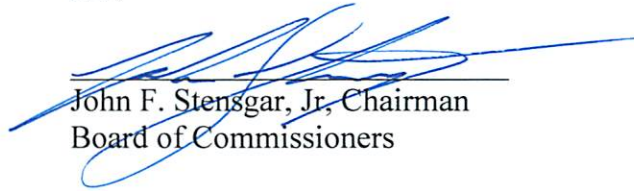
BE IT FINALLY RESOLVED, the Board of Commissioners authorized the CIHA VASH Policies and Procedures be put into effect immediately.

CERTIFICATION

This is to certify that the foregoing was duly enacted, pursuant to Article V of the Colville Tribal Ordinance, ratified on January 27, 1977, at a regular meeting of the Colville Indian Housing Authority

Board of Commissioners, held on December 15, 2016, a quorum being present, with a vote of 3
FOR; 0 AGAINST, and 0 ABSTAINED.


BY:



John F. Stensgar, Jr, Chairman
Board of Commissioners

ATTEST:

BY:



Melanie Green, Secretary/Treasurer
Board of Commissioners

Colville Indian Housing Authority
Tribal HUD Veterans Assistance Supportive Housing Program Guidelines

Background

Homelessness is a significant national problem that has many causes and individuals suffering homelessness are usually unemployed, unable to work, or have such a low income that they cannot access safe affordable housing. Additionally, some individuals who are homeless have disabling mental health, substance abuse, or physical conditions that lead to, or compound, their homeless situation.

In 1992, HUD and VA established the HUD-VASH Program, the primary goal of which is to move veterans and their families out of homelessness. A key component of the HUD-VASH Program is VA's case management services. These services are designed to facilitate the attainment of a veteran's recovery goals by supporting stability in safe, decent, affordable, and permanent housing of the veteran's choice. While VA provides case management services, HUD provides permanent housing stability to veteran participants and their immediate families by allocating rental subsidies from its Housing Choice Voucher ("HCV") Program.

Historically, the HUD-VASH Program did not reach Native American veterans in tribal communities due to legal impediments preventing tribes and Tribally Designated Housing Entities ("TDHEs") from participating in the program. In the Consolidated and Further Continuing Appropriations Act, 2015 (Public Law 113-235, approved December 16, 2014) ("2015 Appropriations Act"), Congress authorized funding for a demonstration program in order to expand the HUD-VASH program into Indian Country. The 2015 Appropriations Act directed HUD to coordinate with Indian tribes, TDHEs, and other appropriate tribal organizations on the design of Tribal HUD-VASH Programs, and to ensure the effective delivery of housing assistance and supportive services to Native American veterans who are homeless or at risk of homelessness.

General Tribal HUD VASH Program Requirements

Through the publication of HUD's Notice in the Federal Register on October 23, 2015 [Docket No. FR 5889-N-01] - Implementation of the Tribal HUD-VA Supportive Housing Program ("HUD Tribal VASH Program Notice"), HUD established program requirements for Tribal HUD-VASH Programs. In accordance with the 2015 Appropriations Act, the HUD-Tribal VASH Program Notice also made appropriate adjustments to program requirements through the issuance of statutory and regulatory waivers that HUD deemed necessary for the effective delivery and administration of rental assistance under Tribal HUD-VASH Programs. Generally, rental assistance under Tribal HUD-VASH Programs is subject to all requirements of NAHASDA that are applicable to rental assistance funded under the Indian Housing Block Grant (IHBG) program. This includes the NAHASDA statute (25 U.S.C. 4101 et seq.), all IHBG program regulations in 24 CFR part 1000, and all other Federal laws and regulations applicable to the IHBG program. To

the extent that program requirements in the Tribal HUD VASH Program Notice differ from any provision in NAHASDA and 24 CFR part 1000, and any other statute or regulation that HUD administers, the terms of the Tribal HUD -VASH Program Notice govern.

Under the Tribal HUD-VASH Program, eligible veterans will receive case management services through the VA and tribes/TDHEs work with the local VA Medical Centers to determine how Case Management will be delivered to eligible Native American veterans. The VA may provide these services directly through the local VA Medical Center, or through a Community-Based Outpatient Clinic (CBOC). A tribe/TDHE may partner with the VA to provide office space within the tribal area for the VA caseworker to operate. Additionally, the VA, in coordination with the tribe/TDHE may partner with IHS to provide space for VA case management activities at an IHS facility.

Native American veterans participating in the program will be housed based on a "housing first" approach, where eligible veterans are provided housing assistance and then offered the supportive services that may be needed to foster long-term stability and prevent a return to homelessness. This approach assumes that supportive services are more effective when the individual or household is housed, and the daily stress of being homeless is relieved. Key components of the "housing first" model include a simple application process for participating veterans, a "harm reduction" approach from the VA, and no conditions of tenancy beyond those included in the housing lease and the requirements in the Tribal HUD-VASH Program Notice. Additionally, the "housing first" approach specifically does not require sobriety or testing for substance abuse to obtain or sustain tenancy, and thus must not be required in the housing lease.

The Colville Indian Housing Authority Program

As a result, the Colville Indian Housing Authority (CIHA), as the TDHE of the Confederated Tribes of the Colville Reservation, has established, developed and is the administrator of the the CIHA's Tribal HUD-VASH Program and is responsible for performing program participant referral to the VA, collaboration with VA Case Management and the award of housing vouchers in accordance with the guidelines set forth herein.

The purpose of the CIHA Tribal HUD-VASH Program is to serve the needs of Colville veterans and other Native American veterans who **are homeless or are at-risk of homelessness** and dealing with unemployment and financial problems due to chemical dependency, gambling or mental health which contributed to homelessness. The veterans most in need of assistance will typically have low or very-low incomes, and will need an array of social and medical services including: case management with an emphasis on independent living skills and employment/educational goals; rental assistance, behavioral health and primary health issues; chemical dependency treatment; and domestic violence counseling and parenting support as appropriate. **Eligibility for the program is determined by the VA Case Manager.**

The Colville Tribal HUD-VASH Program will consist of Tenant Based Rental Assistance, as such term is defined herein, that assists program qualified, low income veteran members of the Colville Tribes and other Native American veterans and their families in locating/renting Reservation and off-reservation rental housing located on and in the communities immediately adjacent to the Colville Reservation and North Half. Ongoing case management is performed by the Tribal HUD-

VASH Program's Case Manager.

Eligibility and selection for the CIHA Tribal HUD-VASH program is based on the applicant's status as (1) a US military veteran; (2) "homeless" or "at risk of homelessness," as such terms are defined respectively in Section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)) and Section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)), as amended; and (3) "low income," as defined in NAHASDA (i.e. has an income that is no more than 80 percent of area median income for the Indian area as determined by HUD). Selection of program participants will be targeted toward assisting those eligible who are most in need, such as veterans who are chronically homeless, unsheltered, and in need of case management services.

The CIHA VASH Program shall follow the "housing first" approach noted in the background section above, which has been shown to be a more effective model at ending homelessness among individuals with significant mental health and substance use disorders; as compared to the "linear model" that requires successful completion of one program within the continuum of care before moving to another program with a different level of care. This model often includes threshold elements such as periods of sobriety, medication compliance, or treatment completion prior to acceptance into another program. For example, the "linear model" requires the individual to obtain treatment (usually residential treatment) until they are "housing ready".

Definitions

"Case Management" – For purposes of the CIHA Tribal HUD-VASH program, Case Management is a specialized component of healthcare management, requiring highly skilled, trained professionals that emphasizes a collaborative process that assesses, advocates, plans, implements, coordinates, monitors, and evaluates health care options and other services so that they meet the needs of the individual patient/program participant.

"Fair Market Rent" or "FMR" – means the rent, as established by HUD, for units of varying sizes (by number of bedrooms), that must be paid in the market area to rent privately owned, existing, decent, safe and sanitary rental housing of modest nature with suitable amenities.

"Homeless" - For purposes of the CIHA Tribal HUD-VASH Program, those considered "homeless" are:

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence.
2. An individual or family with a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings, including a car, park, abandoned buildings, bus, or train station, airport, or camping ground.
3. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, state, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing).

4. An individual who resided in a shelter or a place not meant for human habitation and who is exiting an institution where the individual temporarily resided.
5. An individual or family who:
 - a. Will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, state, or local government programs for low-income individuals or by charitable organizations, as evidenced by:
 - i. A court order resulting from an eviction action that notifies the individual or family that they must leave in 14 days;
 - ii. The individual or family having a primary residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or
 - iii. Credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;
 - b. Has no subsequent residence identified; and
 - c. Lacks the resources or support networks needed to obtain other permanent housing; and
6. Unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who:
 - a. Have experienced a long term period without living independently in permanent housing,
 - b. Have experienced persistent instability as measured by frequent moves over such period, and
 - c. can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.

"At Risk of Homelessness" - For purposes of the CIHA Tribal HUD-VASH Program, those considered "at-risk of homelessness" means an individual or family that:

1. has income below 30 percent of median income for the geographic area;

2. has insufficient resources immediately available to attain housing stability; and
3. (i) has moved frequently because of economic reasons; (ii) is living in the home of another because of economic hardship; (iii) has been notified that their right to occupy their current housing or living situation will be terminated; (iv) lives in a hotel or motel; (v) lives in severely overcrowded housing; (vi) is exiting an institution; or (vii) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

"Tenant-Based Rental Assistance" or "TBRA" – means rental housing assistance that is tied to a specific household. The eligible applicant selects and rents a unit (whether private or CIHA-owned) that meets program requirements, and CIHA makes rent subsidy payments on behalf of the household. The assistance stays with the household; which means that if the household moves to a different unit that meets program qualifications, CIHA makes rental payments to the owner of the new unit on the household's behalf.

Program Staffing and Administration

The VA determines a participant's eligibility for the CIHA Tribal HUD-VASH Program. Upon the VA's determination of initial VASH Program eligibility, in cooperation with the Spokane Veteran Affairs Program, the application for housing and administration of the TBRA will be through CIHA. The Case Manager will be responsible for outreach, education, and promoting the services to eligible Veterans.

Minimum Required Information that the Case Manager will gather and report on required forms include:

- Personal Information on veteran and the household members being served.
- Location/Address of the unit in which the veteran resides.
- Information on the unit including number of bedrooms, type of unit, and other program-required information.
- Tenant's expected monthly contribution towards rent.

Program Eligibility Criteria

Program participants/veterans first will be screened by the VA in accordance with VA screening procedures and by applying the eligibility criteria in Paragraph A below. Colville and other Native American veterans determined by the VA to be eligible for the program will be referred to CIHA based on the eligibility requirements also listed in Paragraph A below. Colville veterans have first preference for the CIHA Tribal HUD-VASH program. Those veterans determined eligible for assistance under this program will then be provided with rental assistance. CIHA may not provide rental assistance under this program unless it receives a referral from the VA and the referred Native American veteran meets the eligibility criteria for housing assistance as described in

Paragraph A below.

A. Veteran Eligibility:

1. VA Screening: The Spokane VA Case Manager determines the initial eligibility of veterans for the CIHA VASH Program. VA screens for the following program eligibility requirements:
 - a. Eligible for VA health care (based on factors such as length of time in active duty, service, and type of discharge as noted on the Native American veteran's *Certificate of Release or Discharge from Active Duty* (DD-214)). More information on veteran status and VA eligibility health care eligibility criteria can be found at http://www.va.gov/about_va/ (Benefits, "Applying for Benefits").
 - b. determination of Homeless or At Risk of Homelessness in accordance with the definitions set forth above.
 - c. A clinical need for Case Management services (a disabling physical or mental condition, or substance use that contributes significantly to the Native American veteran's housing status), as determined by VA.
 - d. The veteran's agreement to participate in VA Case Management.
2. VA will prioritize program eligible veterans based on their level of need for Case Management. Those veterans with the greatest need for Case Management will be the first to be referred to the CIHA VASH program for rental assistance.
3. For the purposes of this program, eligibility status for housing does not extend to a deceased veteran's family.
4. CIHA Screening: CIHA must accept all VA referrals of Colville Tribal member and other Native American veterans and their families from its VA partner and screen for the following eligibility requirements:
 - a. A determination that the veteran is "Indian" as defined in section 4(10) of NAHASDA.
 - b. A determination that the Colville Tribal member or other Native American veteran is income-eligible. To be eligible, a veteran household's annual income must be no more than 80 percent of area median income for the Indian area. **NOTE:** CIHA is subject to the same definition of "annual income" as in 24 CFR 1000.10. CIHA may follow its existing IHBG policies on calculating income in compliance with 24 CFR 1000.10, or may establish new policies specific to the CIHA VASH Program. Tribes and TDHEs may not provide assistance under

this program to any over-income Native American veteran that would otherwise be deemed eligible under the over-income or essential family categories in Sections 201(b)(2) and (3) of NAHASDA, unless the household met the income requirements at the time that they entered the program. To ensure that those Homeless and At Risk of Homeless Native American veterans with the greatest housing need will be first served by this program, HUD has found it necessary to waive Sections 201(b) (2) and (3) of NAHASDA, and regulations at 24 CFR 1000.104 – 1000.110, to limit eligibility to Native American veterans whose income is no more than 80 percent of area median income for the Indian area.

- c. Program applicants must pass a background check documenting that the applicant, or any household member, is not a registered as lifetime sex offender. NOTE: For purposes of CIHA Tribal HUD-VASH Programs, HUD is adopted the alternative requirements to section 207(b) of NAHASDA, and 24 CFR 1000.120, relating to tenant selection and is applying the screening requirements similar to 24 CFR 982.553(a)(2) relating to registered lifetime sex offenders. As a result, tribes/TDHEs are required to establish written standards that prohibit admission if the veteran or any member of the household is subject to a lifetime registration requirement (Tier III offense) under any State sex offender registration program. As part of the eligibility screening process, a tribe/TDHE must perform a background check to see if the referred veteran or any household member is subject to a lifetime sex offender registration requirement in the State where the housing is located and in other States where the household members are known to have resided. If a household member other than the Homeless or At Risk of Homelessness veteran (which would result in denial of admission for the household) is subject to lifetime registration under a State sex offender registration, the remaining household members may be served if the veteran agrees to remove the sex offender from its household composition. This requirement is necessary to ensure consistent policy across CIHA Tribal HUD-VASH programs relating to providing assistance to registered sex -offenders.

In addition to the above, CIHA will also provide preference first, to veterans who are enrolled members of the Colville Tribe and secondly, to any Native American veteran.

Income-Specific Requirement

CIHA shall be responsible for determining tenant income eligibility initially and annually at recertification. To be eligible, all households must meet the income requirements of CIHA's NAHASDA program.

Preference

The CIHA has adopted a tribal preference policy in its admissions and occupancy plan that provides that the CIHA will provide assistance to a Colville tribal members before members of other Indian tribes, the CIHA will prioritize assistance under this program to tribal members.

Application Procedure

Anyone interested in being admitted to the CIHA Tribal HUD-VASH Program must complete a written CIHA VASH Program application. Applications will be accepted in person at the CIHA office or by Case Manager's office located within the Tribal VA offices.

The completed application must include the following items:

- A. Complete names, dates of birth, and correct social security numbers for all members who plan to reside in the household.
- B. A criminal background release or Sex Offender declaration form.
- C. Enough information to enable CIHA to determine the household's eligibility with regard to:
 1. Anticipated gross annual income.
 2. Current assets.
 3. Household size.
 4. Household demographics.

All applications must be completed and signed by all adult members of the household.

Reasons for Program Rejection

Rejection of an applicant may occur at any time during the application, eligibility, screening or interview process due to the following:

1. Failure to meet the Eligibility Criteria as described in this document or failure to provide sufficient information to determine the eligibility that applies to this section.
2. The applicant refuses to comply or will not comply with housing program requirements, policies and/or procedures. (I.e. Failure to sign and submit relevant forms, consent, releases, etc.).
3. The applicant purposefully falsified, misrepresented or withheld information or submitted inaccurate and/or incomplete information on any application or during

any interview that was related to eligibility, awarding of preference for admission, household composition or rent.

4. The applicant fails to disclose all correct social security numbers or other requested forms of documentation when social security numbers have not been assigned.

The application with reason for rejection noted thereon shall be kept on file for a period of not less than three (3) years or until a compliance review has been conducted.

Application Review

CIHA shall review participant files once finalized and complete with all relevant income, tribal affiliation, veteran's status and current living conditions documented before rents or deposits are issued. Files are to be reviewed for completeness no less than 3 working days in order they are received.

Tenant Program Retention Plan Principles

GENERAL PRINCIPLES - The primary goal of the CIHA Tribal HUD-VASH Program is for participants to successfully maintain their housing in a safe and healthy manner. To achieve that goal, the parties (i.e. tenants with assistance from the Case Manager, the VA, CIHA and all other applicable individuals/partners) will make every feasible effort to assist program participants successfully retain their housing. The parties have agreed to the following principles:

TENANT HOSPITALIZATIONS - Tenant hospitalizations and inpatient treatment will be permitted up to ninety (90) days for each occurrence without termination of program participation. If hospitalization persists longer than 90 day stay, participant is still eligible to come back and re-qualify for the program.

SUCCESSFUL TENANCY - Program participant lease agreement violations most likely will occur and CIHA shall take any reasonable steps to assist program participants to retain their housing or find new housing in the event of eviction. Additionally, crisis management related to a program participant's housing/continued tenancy issues may require immediate response from the Case Manager, who will take the lead to address the issue with the affected tenant(s).

Awarding Housing Assistance to an Eligible Veteran

Once CIHA performs all the activities listed above and the veteran is deemed eligible, CIHA must offer rental housing assistance provided by this program to the participant. Tenant-Based Rental Assistance must be provided with an initial search term of 120 days from the date such assistance is offered.

To ensure consistency with the standard HUD-VASH program and to serve the maximum number of Native American veterans in need of housing stability, CIHA may not be allowed to deny assistance to an otherwise eligible veteran who has been referred by the Case Manager on any grounds other than preferences based on tribal membership in accordance with the CIHA's written admissions and occupancy policies. As CIHA has adopted a tribal preference policy on admissions and occupancy that provides that the CIHA will provide assistance to a tribal member before members of other Indian tribes, CIHA may prioritize assistance under this program to Colville Tribal members. If CIHA has remaining grant funds after serving its tribal member veterans, it must serve other referred Native American veterans that are members of other Indian tribes until all grant funds under this program have been fully spent, and may not refuse to provide such assistance. CIHA may not deny admission to a referred and eligible Native American veteran because of any factors or reasons, other than tribal preference, such as criminal history (aside from sex offender status) or substance abuse.

Record Keeping At Initial Occupancy

In addition to maintaining records of referral and eligibility determination as required above, CIHA must also collect, keep on file, and report, additional household demographic, personal (including social security numbers), and rental information using a HUD-50058 form revised for the Tribal HUD-VASH program. This information also is required to be reported through an electronic reporting system as prescribed by HUD.

At initial occupancy, CIHA will need to collect Social Security numbers (SSNs) for Homeless or At Risk of Homelessness veterans and their household members. This information must be maintained in the veteran's physical file. An original document issued by a federal, state, or tribal government agency, which contains the name of the individual and the SSN of the individual along with other identifying information, is acceptable in accordance with the standards in 24 CFR 5.216(g). In the case of the Homeless or At Risk of Homelessness veteran, CIHA must accept the *Certificate of Release or Discharge from Active Duty* (DD-214) or the VA-verified *Application for Health Benefits* (10-10EZ) as verification of SSN, and cannot require the veteran to provide a SSN card. These documents must also be accepted for proof-of-age purposes in lieu of birth certificates or other CIHA-required documentation. Please note that veterans are also issued photo identification cards by the VA. If such identification is otherwise required by CIHA, these cards must be accepted by the CIHA in lieu of another type of government-issued photo identification.

Tenant Based Rental Assistance

When needed, CIHA in coordination with the VA Case Manager, will identify the best available off reservation rental housing options for homeless program participants in close proximity to public transportation and VA service offices/facilities.

Local Housing Codes and Quality Standards

Once a unit is located or ready to be occupied by a veteran, CIHA must make a determination that the unit meets applicable local housing codes and quality standards in accordance with

section 207(a) (2) of NAHASDA.

Rent

Due to the limited availability of housing stock on or near reservations or in NAHASDA Indian Areas that is not developed, or has been otherwise assisted, with NAHASDA funding, HUD has found it necessary to establish alternative requirements regarding the maximum rent for a unit assisted under NAHASDA. These alternative requirements affect sections 203(a) of NAHASDA, and regulations at 24 CFR 1000.124, and 1000.130, which limit the maximum rent that can be charged to 30 percent of a household's adjusted monthly income. The alternative requirement allows CIHA to determine rents by bedroom size based on the local FMR, market conditions and/or unit operating costs. CIHA must submit a justification as to how rent is determined in its program application. **NOTE:** For both, housing units owned or operated by the tribe/TDHE, and privately owned units, rents may not exceed 110 percent of FMR. If CIHA deems it necessary to charge more than 110 percent of FMR (or to place a veteran in a privately-owned unit with a rent that exceeds 110 percent of FMR), it must obtain HUD's prior approval to do so. For example, a tribe/TDHE may find it necessary to request such approval in order to address a request for a reasonable accommodation or in instances where rental market conditions render it difficult to find rent at 110 percent of FMR. HUD encourages tribes/TDHEs to establish rents at a level that is less than 110 percent of the FMR, particularly in housing that is owned or operated by the tribe/TDHE, to allow more Native American veterans to receive assistance. These alternative requirements do not apply to any other HUD-assisted housing that may be subject to other rent restrictions.

Tenant Rent Contribution Payment

Eligible program veterans and their families are required to make a monthly tenant rent contribution payment that is no more either (i) 30% percent of their monthly adjusted income (as defined in NAHASDA and implementing regulations); **NOTE:** Consistent with 24 CFR 1000.132, the tribe/TDHE may determine if utilities are included in the rent for the unit. The tribe/TDHE may also make this determination when negotiating rental assistance payment contracts with private-owners of housing. Tribes/TDHEs may establish a tenant rent contribution payment amount for a Native American veteran that is less than 30 percent of monthly adjusted income. IHBG funds may be used to cover any additional costs related to housing Native American veterans and their families under this program.

Rental Assistance Payment Contract

CIHA must enter into a contract with the owner of any privately-owned rental housing units in which a program-assisted veteran will reside. The contract will govern rental assistance provided under this program to the owner by CIHA. **NOTE:** Specific contract terms and conditions are required and HUD is currently developing additional guidance on the required contract contents.

Case Management

As part of the Case Management duties, the CIHA VASH program Case Manager will assist the veteran in locating appropriate housing for the veteran. The Case Manager's responsibilities for

Case Management also include (1) providing appropriate treatment, referrals, and supportive services to the veteran prior to CIHA's issuance of rental assistance; (2) identifying the social service and medical concerns of the veteran and providing, or ensuring the provision of, regular ongoing Case Management, outpatient health services, crisis intervention, and other supportive services as needed throughout the veteran's participation period; and (3) maintaining records and providing information for evaluation purposes, as required by HUD and the VA.

As a condition of receiving rental assistance under this program, an eligible veteran must agree to receive the Case Management services noted above. If the CIHA VASH Program Case Manager determines that a veteran fails to participate without good cause in Case Management, the participant's rental assistance may be terminated. However, a determination by the Case Manager that the participant veteran no longer requires Case Management is not grounds for termination of assistance.

Veterans will be able to meet in person at either the Case Manager's VA CIHA's offices, as well as scheduled meetings with the Case Manager to meet with program participants at their desired location (VA, home visits, etc).

Delivery of Services shall primarily be through the VA Case Manager in collaboration with local service providers on and off the reservation.

Case Management Overview

I. Case Manager's Role – Clinical. The Case Manager will provide or obtain the following clinical services:

- A. Assessment of clinical needs (physical, emotional and substance use disorders, social concerns, legal concerns, etc.).
- B. Develop a plan with the Veteran identifying those goals that the Veteran would like to accomplish, including sustaining tenancy.
- C. Coordinate clinical care with health care resources.
- D. Provide clinical care within their scope of practice (skill building, therapeutic interventions, and education).
- E. Work with Veterans to help them gain readiness for areas the Veteran is not yet ready to tackle, such as substance use.
- F. Ensure safety (such as suicide prevention).

II. Case Manager's Role – Housing. The Case Manager will be expected to assist program participants with the following housing services:

- A. Gather required documentation.

- B. Assist with applications.
- C. Coordinate meetings with housing authority.
- D. Assist with housing search.
- E. Assist with requesting housing unit inspection(s).
- F. Facilitate the standard lease and steps for subsidy assistance.
- G. Assist planning the client's move into the unit.
- H. Assist with required deposits and utilities by identifying resources to offset or establish, as needed.
- I. Develop a client plan for meeting tenancy requirements.

III. Case Manager's Role – Tenancy. Clients must meet their tenancy requirements and CIHA's housing rules. The Case Manager will work with and assist program clients to:

- A. Develop a plan for payment of rent verification.
- B. Discuss meeting cleanliness and safety requirements.
- C. Address behavioral issues that might endanger tenancy (allowing neighbor's peaceful enjoyment of their units).
- D. Planning for emergencies (water heater leak, etc.).
- E. Develop strategies for working with the clients' landlord/manager.

IV. Case Manager's Role – Education and Groups. Case Manager also may participate or assist program participants with participation in educational sessions or groups. Education may be centered around tenancy or independent living skills. Groups may be centered around or related to:

- A. Treatment (a Substance Use Disorder group, for example).
- B. Skill building (Communication skills, money management, time management).
- C. Open discussion for problem solving or general concerns.
- D. Socialization.
- E. Support Groups.

V. Case Manager's Role – Other Case Management Activities.

- A. Home visits to check on the veteran's functioning and work and progress on

addressing concerns and needs.

- B. Transportation to assist veterans with housing search or get to clinical appointments. This may require directly transporting the veteran or assistance with arranging/scheduling transportation.
- C. Addressing or assisting with other needs such as obtaining food, cooking simple recipes, socializing, etc.

VI. Case Manager's Role – Data Collection and Documentation.

- A. Case Managers are expected to enter data into the CIHA Housing Data System (HDS) database. HDS is an extensive data system that tracks the program's outcomes to assist CIHA in evaluating whether the program is meeting program objectives and helping determine where there might be program deficiencies that require attention and/or improvement.
- B. Determine CIHA VASH Program participant's eligibility and resources needed to be in the program including:
 - 1. Homeless or “at risk” of homelessness per the Federal definitions noted above.
 - 2. Assessment of needs and case management services (functional limitations preventing a veteran's ability to sustain housing independently without the need for case management support).
 - 3. Obtain participant's agreement to participate in the CIHA VASH Program.
 - 4. Identify the limited resources of program participants.
 - 5. Determination and prioritization of those with the most need – chronically homeless, literally homeless and/or unsheltered homeless get first priority for assistance.
 - 6. Determination of participant's health status, disabilities and functional limitations on independence.

Partnerships

To assure a successful program, other CIHA VASH Program partners, in addition to CIHA and the Spokane VA office/facilities, include the Colville Veteran Affairs Program, which will coordinate with and assist CIHA in identifying veterans in need of housing and potential and/or additional program resources and assistance.

Nondiscrimination Requirements

For purposes of CIHA's Tribal HUD-VASH Program, CIHA is subject to all nondiscrimination requirements that are applicable under NAHASDA and the IHBG regulations at 24 CFR part 1000 and in particular 24 CFR 1000.12.

Grievance Procedures

Refer to Colville Indian Housing Authority's Wait List Grievance Procedure