



SHALLOW SUBSIDY

[Link to Audio](#)

Agenda

- ▶ Welcome and Introductions
- ▶ Shallow Subsidy Overview
- ▶ Stafford Act Exemptions
- ▶ Transitions from Shallow Subsidy
- ▶ HMIS Reporting
- ▶ Next steps
- ▶ Questions



SHALLOW SUBSIDY

OVERVIEW

Shallow Subsidy Communities

The Shallow Subsidy coverage areas for the FY2021 grant year were limited to the following geographical areas as identified by county:

- **California:** Los Angeles, San Francisco, Alameda, San Diego, Santa Clara, Contra Costa, Marin, San Mateo, San Bernardino, Kern, Riverside, Orange, Imperial, Solano, Santa Cruz, Ventura, Sacramento, Amador, San Joaquin, Kings, Tulare
- **Washington:** King, Pierce, Snohomish
- **Hawaii:** Honolulu, Hawaii, Maui, Kauai

- **Illinois:** Cook
- **New York:** New York, Bronx, Queens, Kings, Richmond, Nassau, Westchester, Rockland, Putnam, Ulster, Sullivan, Suffolk
- **District of Columbia:** District of Columbia
- **Virginia:** Fairfax, Prince William
- **Maryland:** Prince Georges, Montgomery

New Funding will allow Shallow Subsidy to be implemented by all grantees.

Shallow Subsidy Expansion

- ▶ ARP funds will be used to expand Shallow Subsidy
 - ▶ SSVF Program Office will determine allocations
 - ▶ A minimum of 40% of Shallow Subsidy funds must be used as TFA rental support as Veterans are not expected to need high intensity services.
- ▶ SSVF grantees will be responsible for determining the estimated number of Shallow Subsidy participants based upon program design considerations



SHALLOW SUBSIDY

SERVICE

Shallow Subsidy...

- ▶ is a service of SSVF and not a separate program.
- ▶ is a 2 year commitment by the grantee to the household – unless the household terminates or has a voucher
- ▶ can be augmented by local funds and other non-federal resources.

SSVF enrollment & eligibility remain the same with additional considerations for when to use Shallow Subsidy for individual households.

Shallow Subsidy (cont')

- ▶ Stable monthly rent subsidy amount with max rate of 35% FMR or rent reasonableness
- ▶ Subsidy amount is fixed over the 24 month commitment
 - ▶ Differentiating it from Rapid Rehousing which can be a deeper subsidy but is shorter term
 - ▶ No recertification required for entire Shallow Subsidy period so no disincentive to increase income
- ▶ Veterans have the ability to be re-certified at the end of the 24 month assistance period, if income eligible.

Veteran Eligibility for Shallow Subsidy Service

- ▶ Must be eligible for SSVF when transitioning to Shallow Subsidy Service Type
- ▶ Generally requires minimal supportive services/tenancy supports
- ▶ Has the ability to pay the balance of rent.
 - ▶ Only needs moderate rental assistance differentiating it from HUD-VASH services.

Example: If the rent on a studio unit is \$1,273.00, Shallow Subsidy will cover \$445.55. Veteran has the demonstrated ability to pay \$827.45.

Target Populations for Shallow Subsidy Service

Veterans could...

- ▶ Potentially be a good candidate for HVRP or other employment service (not required) and/or has the ability to build income (work or non-work) over time.
- ▶ Be on fixed incomes such as retired seniors or disabled Veterans - effective prevention tool.
- ▶ Be on the waiting list for affordable housing opportunities or engaged in pursuing shared housing opportunities
- ▶ Be a good candidate if they are a Veteran who “but for” this financial assistance.....

Homeless Veterans Reintegration Program (HVRP)

HVRP ...

- ▶ Includes the Homeless Female Veterans', Homeless Veterans with Families Program (HFVWF), and The Incarcerated Veterans' Transition Program (IVTP).
- ▶ Provides a core set of services (e.g. outreach, case management, job training) which are customized to meet the needs of Veterans, the employers in the area, and the local labor market.
- ▶ Focuses services on providing Veterans experiencing homelessness with relevant skills, connecting these Veterans to employers, and improving employment outcomes and earnings for Veterans while they are enrolled.

Homeless Veterans Reintegration Program (HVRP) (cont'd)

HVRP also...

- ▶ Addresses barriers to employment through a strengths-based case management approach, leading to career placements and sustained retention.

**Beginning July 1 (PY 2021): 155 grants
serving 45 states plus DC.**

HVRP Partnering Opportunities

- ▶ Co-enroll with SSVF to support access/retention of employment and efforts to build/increase income
- ▶ HVRP grantee focuses support on specialized job coaching, job placement, training

Veteran Pathways to Shallow Subsidy Service

Veteran may be transitioned from traditional SSVF RRH or Prevention services to Shallow Subsidy services

- ▶ Generally expected to be part of a progressive engagement approach, employed after Rapid Re-housing or Homeless Prevention assistance.
- ▶ Regardless of Subsidy type all Veterans must be enrolled initially as either RRH or Prevention for purposes of eligibility, HMIS, and grant management.

Additional Veteran Pathways to Shallow Subsidy Service

In some cases, Veterans may be referred at initial intake bypassing need for rental assistance or deposits from traditional SSVF

- ▶ For literally homeless Veterans consider providing traditional SSVF RRH first
- ▶ May be more likely in HP cases
- ▶ Full SSVF Rental Assistance not available once Shallow Subsidy begins

NOTE: Since a minimum of 40% of Shallow Subsidy funds must be under TFA, Veterans needing more intense services should start in traditional SSVF or HUD-VASH.

Veteran Shallow Subsidy Service Documentation Process

Prior to transitioning to Shallow Subsidy...

- ▶ Recertify
- ▶ Review Income and Housing Stability plan
- ▶ Housing Habitability Standard
 - ▶ Can use prior documentation of habitability if less than 1 year old
- ▶ Verify that the Veteran can remain in the current housing unit
 - ▶ 2 year lease not necessary, but the expectation is that Veteran will remain in current housing unit.
- ▶ Explore and apply for affordable housing, if applicable, while in Shallow Subsidy

Shallow Subsidy Services & Practices

- ▶ While providing shallow subsidy services
 - ▶ Lighter level of case management generally expected for Veterans
 - ▶ Monthly check-ins
 - ▶ Verify tenancy in assisted housing unit
 - ▶ Verify household is able to make rental assistance payments
 - ▶ Grantees must still have the ability to elevate supportive services for Veterans as needed
- ▶ Document Check-Ins
 - ▶ Client Files
 - ▶ HMIS

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Stafford Act Exemptions

The Stafford Act

The Stafford Act is the federal disaster declaration that allows for increased flexibilities in the SSVF Programs. Although the end date of the Stafford Act is not known yet, the SSVF Program Office has been granted the authority to continue providing expanded services 90 days beyond the end date when declared. This authority allows Grantees to continue to provide additional financial assistance, along with emergency housing assistance in hotels, with the goal to successfully transition and stabilize Veterans in permanent housing.

Shallow Subsidy Stafford Act Exemptions

- ▶ For households at 30-50% AMI, previous regulations meant Shallow Subsidy assistance was more limited.
- ▶ Length of subsidy for this group was normally 2 years minus months of “traditional” SSVF rental assistance
- ▶ **Stafford Act exemption** allows grantee to set time limit without regard to previous rental assistance
- ▶ This would allow for Veteran households with income between 30% and 50% AMI to receive a full 2 years of supports regardless of prior assistance provided, if started Shallow Subsidy services after March 2020.
- ▶ Grantees could offer traditional RRH rental assistance first and then use Shallow Subsidy services once the rental assistance reaches caps.

Shallow Subsidy Under Stafford Act

- ▶ Recommended that grantee sets time limit at 2 years for all placements supported by Shallow Subsidies, regardless of previous rental support
- ▶ Commitments made during Stafford Act exemption continues beyond end of disaster declaration – Shallow Subsidy rent support is a full 2 years
- ▶ Max rate is 35% of rent reasonableness or FMR, if it is more advantageous for the Veterans

SHALLOW SUBSIDY

*Transitions
from Shallow
Subsidy*

Transitions from Shallow Subsidy

▶ **Transition to Permanent Subsidy**

- ▶ Site based subsidized unit
- ▶ Voucher (HUD VASH, Section 8)
- ▶ Section 811 Project Based Assistance

▶ **At Recertification**

- ▶ If Veterans have increased household income through employment, benefits or other options, they will terminate
- ▶ If Veterans have not increased household income, re-certification is possible for an additional 2 years, if income eligible

Transitions from Shallow Subsidy (cont'd)

- ▶ Termination from SSVF – Abandoned Unit or Unknown Whereabouts
 - ▶ Abandoned unit, unable to locate Veteran
 - ▶ SSVF provider may terminate Veteran after 90 days
 - ▶ May pay SSVF portion of rent unless lease is terminated
- ▶ Termination from SSVF – Absence from Unit
 - ▶ Incarceration longer than 90 days

Eviction alone is not reason for termination from SSVF.



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HMIS Reporting

HMIS Reporting Requirements

- ▶ Veteran households who are initially enrolled in traditional SSVF and later begin receiving Shallow Subsidy services will remain open in HMIS in their original project type
- ▶ Veteran households should not be terminated from SSVF and reopened with a new enrollment when they begin receiving Shallow Subsidy services unless they are being referred from another SSVF grantee, in which case there are extra considerations below.
 - ▶ If the client's housing situation did not change during the transfer between providers, the same HMIS project type (HP or RRH) should be used from the transferring provider. When in doubt, follow the VA Data Guide for all data collection requirements.
 - ▶ When accepting a transfer from another SSVF provider the "Prior Living Situation" should be accurately entered in HMIS to reflect the PLS at the time of the transfer.

HMIS Reporting Requirements (cont'd)

- ▶ SSVF providers are prohibited from conducting re-certifications of eligibility during the 2 year Shallow Subsidy period. However, SSVF Grantees must document activities in HMIS
 - ▶ Monthly check-ins with Veterans in HMIS must be entered as service using data element V2 Service Type –#7 Extended Shallow Rent Subsidy
 - ▶ All TFA rental payments must be entered in HMIS by entering the date and amount of financial assistance and selecting HMIS data element V3 Financial Assistance Type -#15 Extended Shallow Subsidy –Rental Assistance.
 - ▶ Veteran income entered into HMIS on a quarterly basis.

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*Next Steps
for Expansion*

Next Steps: Grantees

- ▶ Plan & Strategize with a Focus on Equity
 - ▶ **Engage** in data informed planning to address any disparities or service gaps
 - ▶ **Identify** partnerships to address any disparities or service gaps noted
 - ▶ **Monitor** outcomes for intended (and unintended consequences)
- ▶ Engage the Community
 - ▶ **Educate** all system partners/stakeholders about new services available under SSVF- especially Veterans and Veterans with Lived Expertise Groups
 - ▶ **Collaborate** with Continuum of Care (CoC), stakeholders, and other local grantees to plan for how best to integrate the new service type in community planning
 - ▶ **Explore** partnering with other resources to deepen subsidy

Next Steps: Grantees (cont'd)

- ▶ Refine processes to include this new service type
 - ▶ Integration of Shallow Subsidy as a part of SSVF service package
 - ▶ Intentional part of shared housing strategy
 - ▶ Meaningful partnerships with HVRP/DoL and other employment programs
- ▶ Update
 - ▶ Referral pathways and tracking systems
 - ▶ Financial Reporting and Projections
 - ▶ Staffing and Caseload Planning

Next Steps: Grantees (cont'd)

- ▶ Create Messaging and Marketing Materials
 - ▶ Landlords
 - ▶ Veterans
 - ▶ Community Partners
- ▶ Coordinate with local CoC for HMIS Reporting Requirements

Next Steps: SSVF Program Office

- ▶ SSVF Program Office will offer support and technical assistance
 - ▶ Webinars
 - ▶ Leveraging Shallow Subsidy Funds and Compliance/Budgeting
 - ▶ Partnerships with HVRP/DOL and other employment programs
 - ▶ Best Practice Spotlights from Shallow Subsidy Pilot Communities
 - ▶ Regional Meetings or CoPs focused on Shallow Subsidy Implementation
 - ▶ 1-1 support from RC/TA as needed
 - ▶ TA Resources
 - ▶ Draft Referral Templates
 - ▶ Messaging Flyers

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*Questions
& Discussion*