

FREQUENTLY ASKED QUESTIONS

Emergency Housing Vouchers (EHVs)

GENERAL INFORMATION

How is an EHV different from a typical tenant-based Housing Choice Voucher (HCV)?

All statutory and regulatory requirements regarding the HCV program are applicable to EHVs, including the use of all HUD-required contracts and forms. There are a few key differences, including:

- Eligibility requirements (described below)
- Partnerships with local Continuum of Care (CoC) agencies
- Access to supportive services such as housing search assistance
- Fewer criteria for denial of assistance at eligibility (described on page 2)

Who is eligible for an Emergency Housing Voucher?

EHV eligibility is limited to individuals / families who meet at least one of four criteria (defined on page 3):

- Homeless;
- At risk of homelessness;
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking; or
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or high risk of housing instability

How many EHVs are available?

The San Antonio Housing Authority (SAHA) has received 284 EHVs which were awarded in May 2021 with funding from the American Rescue Plan which was signed into law in March 2021.

How is the SAHA partnering with Continuum of Care agencies?

As a part of the EHV program, SAHA is required to work with a CoC agency to determine the best use and targeting for the vouchers along with other resources available in the community. Therefore, SAHA is partnering with the South Alamo Regional Alliance for the Homeless (SARAH). SARAH is the designated lead Continuum of Care (CoC) agency for San Antonio and Bexar County and will be responsible for referring eligible individuals and families to SAHA.

What is SAHA's role in providing Emergency Housing Vouchers?

SAHA is responsible for all the administrative responsibilities for the EHV program which include but are not limited to:

- Reviewing applications for EHV, certifying program eligibility, and conducting annual recertifications for continued eligibility
- Determining that the unit meets Housing Quality Standards and approving units for leasing and contracts
- Determining amounts and paying Housing Assistance Payments to landlords on behalf of participants
- Explaining and providing information about program policies and procedures to current and prospective landlords and participants
- Monitoring program performance and compliance of participants and owners

EHV PROGRAM SPECIFICS

How does someone apply for an Emergency Housing Voucher?

If someone is interested in receiving an EHV, they must meet at least one of the eligibility requirements described on page 1. Voucher clients can contact the Homeless Connections Hotline at 210-207-1799 for their Coordinated Entry/Homelink assessments. SAHA will receive referrals for the EHV program through SARAH to begin the application process.

How can someone be denied assistance for an Emergency Housing Voucher?

SAHA will deny admission for the following reasons:

- If any household member has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing
- If any member of the household is subject to a lifetime registration requirement under a State sex offender registration program
- If any member of the family fails to sign and submit consent forms for obtaining information
- If any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program within the previous 12 months.
- If any household member has engaged in violent or other criminal activity in accordance with the modified SAHA Criminal History Screening Criteria Grid (attached)

What criteria will not disqualify an individual from being denied an Emergency Housing Voucher?

Unlike the HCV Program, SAHA will not deny an EHV applicant admission for the following, regardless of whether:

- Any member of the family has been evicted from federally assisted housing or the PHA has ever terminated assistance under the program for any member of the family.
- The family currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance.
- The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.
- The family breached an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA.
- The family would otherwise be denied admission under alcohol abuse standards established by the PHA in accordance with §982.553(a)(3).
- The PHA determines that any household member is currently engaged in or has engaged in drug-related criminal activity during a reasonable time before the admission.

What type of verification documents are required?

While families are initially able to self-certify their qualifications, EHV holders must provide the required Social Security Number (SSN) / citizenship documentation within 180 days of admission, unless SAHA provides an extension based on evidence from the family, CoC, or partnering agency that the family has made a good faith effort to obtain the documentation. Additionally, SAHA must obtain a higher level of verification of date of birth and disability status within 90 days of admission or verify the information in HUD's Enterprise Income Verification (EIV) system.

SAHA may accept self-certification for income verification at admission through an affidavit attesting to reported income, assets, expenses, and other factors which would affect an income eligibility determination. SAHA has included a statement form with the SAHA Referral Packet for this purpose that must be notarized in order to qualify as a sufficient self-certification of income.

What is the income limit to qualify for an Emergency Housing Voucher?

SAHA will screen EHV applicants at the “low-income” limit, which begins at \$41,550 for a single person family. See the table below for a full list of low-income levels for different family sizes. Anyone who meets the low-income limit or below will qualify for an EHV.

# of people	1	2	3	4	5	6	7	8
Low Income	\$41,550	\$47,450	\$53,400	\$59,300	\$64,050	\$68,800	\$73,550	\$78,300

Do the same SAHA SAFMR payment standards apply to EHV's?

HUD is permitting PHAs to establish separate higher payment standards for the EHV's in order to increase the potential pool of available units for EHV families.

What is the definition of “homelessness”?

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - 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 building, bus or train station, airport, or camping ground;
 - An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); **or**
 - An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - No subsequent residence has been identified; **and**
 - The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - Are defined as homeless under section 387 of the Runaway and Homeless Youth Act, section 637 of the Head Start Act, section 41403 of the Violence Against Women Act of 1994, section 330(h) of the Public Health Service Act, section 3 of the Food and Nutrition Act of 2008, section 17(b) of the Child Nutrition Act of 1966, or section 725 of the McKinney-Vento Homeless Assistance Act;
 - Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

- Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; **and**
- 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 (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

What is the definition of “at-risk of homelessness”?

(1) An individual or family who:

- Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition above; **and**
- Meets one of the following conditions:
 - Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - Is living in the home of another because of economic hardship;
 - Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;
 - Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act, section 637(11) of the Head Start Act, section 41403(6) of the Violence Against Women Act of 1994, section 330(h)(5)(A) of the Public Health Service Act, section 3(m) of the Food and Nutrition Act of 2008, or section 17(b)(15) of the Child Nutrition Act of 1966; **or**

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth, if living with her or him.

What is the definition of “fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking”?

Domestic violence includes felony or misdemeanor crimes of violence committed by:

- a current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate

nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship),

- a person with whom the victim shares a child in common,
- a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
- a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or
- any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence means violence committed by a person:

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; **and**
- Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship;
 - The type of relationship; and
 - The frequency of interaction between the persons involved in the relationship.

Sexual assault means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for the person's individual safety or the safety of others; **or**
- Suffer substantial emotional distress.

Human trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. § 7102). These are defined as:

- *Sex trafficking* means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age;
- *Labor trafficking* means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

What is the definition of "recently homeless"??*

*Individuals and families classified as recently homeless must be referred by the CoC or its designee.

Recently homeless is defined as individuals and families who have previously been classified by a member agency of the CoC as homeless but are not currently homeless as a result of homeless assistance (financial assistance or services), temporary rental assistance or some type of other assistance, and where the CoC or its designee determines that the loss of such assistance would result in a return to homelessness or the family having a high risk of housing instability. Examples of households that may be defined as recently homeless by the CoC include, but are not limited to, participants in rapid rehousing, and permanent supportive housing.

SAHA CHR Screening Criteria Grid - Emergency Housing Vouchers

Offense Category	Within seven (7) years of <u>offense</u>	Within five (5) years of <u>offense</u>	Within three (3) years of <u>offense</u>
Violent Criminal Activity	<ul style="list-style-type: none"> • 1st Degree / 2nd Degree Homicide • Manslaughter / Criminally Negligent Homicide • Assault / Battery • Robbery (All Types), including Aggravated Robbery • 1st Degree Felony Injury to an Elderly or Disabled Individual • Sexual Assault / Sex Offenses • Deadly Conduct • Weapons Offense (Against Person) • Kidnapping, Abduction, and Unlawful Restraint • Family Violence/Domestic Violence 	<ul style="list-style-type: none"> • Stalking • Harassment • Crimes involving Terrorism / Terroristic Threat 	<ul style="list-style-type: none"> • Assault by Contact • Crimes against Animals
Other*	<ul style="list-style-type: none"> • Arson-related • Human Trafficking 	<ul style="list-style-type: none"> • Fraud • Burglary/Breaking and Entering (Felony Only) • Criminal Mischief / Damage / Property Vandalism (Felony Only) • Felony Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (2 or more convictions) 	<ul style="list-style-type: none"> • Trespassing • Theft/Stolen Property (if 2 convictions or more) • Weapons-related (other than use of weapons against person) • Prostitution (Felony Only) • Solicitation • Destruction of Property • Misdemeanor Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (2 or more convictions)

*Other is defined as the following:

- Criminal Activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other

residents or persons residing in the immediate vicinity (within a three-block radius); and

- Criminal activity that may threaten the health or safety of property owners and management staff, and persons performing contract administration functions or other responsibilities on behalf of SAHA (including a SAHA employee or a SAHA contractor, subcontractor, or agent).

Note: If an expunged conviction appears on a criminal background report, it will not be considered in the screening process.

Attempts and conspiracies to commit a crime will be treated the same way as the primary crime. For example, an applicant with a conviction for attempted murder will be screened the same way as a person with a conviction for murder.

Admin Plan 3.3.E