

Emergency Housing Vouchers

Frequently Asked Questions

General Questions

What is a PHA?

PHA stands for Public Housing Agency. Many PHAs operate a Housing Choice Voucher (HCV) and/or Public Housing Program on behalf of HUD. The Detroit Housing Commission (DHC) is classified as a PHA.

What is DHC's role?

DHC administers the HCV program providing front-line services to program applicants, participants, owners, and management companies which includes the determination of participant eligibility and the approval of safe, decent, and affordable housing units. DHC is working directly with the Continuum of Care (CoC) and other service agencies as it relates to EHV applicant eligibility and lease-up..

Is the program going to take over PSH and MDHHS programs?

While individuals/families participating in PSH programs may qualify for the EHV, the EHV's will not replace those funding sources/programs.

EHV Alternatives and Waivers

How long will the 120% of the Fair Market Rent last?

HUD is allowing PHAs to set the Payment Standard for EHV's at 120% of the Fair Market Rent (FMR). This is slightly higher than the regular HCV program, which is capped at 110% of the FMR. While HUD allows to go up to 120% of the FMR, the unit must still meet rent reasonableness. It is DHC's intent to adopt 120% of the FMR for EHV's and this would remain in effect throughout the duration of the EHV's, unless HUD issues guidance that eliminates the use of this alternative waiver.

Can you confirm there is no county preference?

Given the emergency nature of these vouchers, the fact that many individuals and families in the targeted populations may not necessarily qualify as a "resident" due to their housing circumstances, HUD has determined that PHAs may not apply any residency preference to EHV applicants.

As stated above, if the EHV individual/family is determined eligible for the voucher, they can move to any county within Michigan or outside of the state of Michigan. If they move outside of the initial CoC jurisdiction, but within the state of Michigan, the receiving CoC may provide the EHV services as required for that individual/family. In these instances, DHC may transfer the service funds from the initial CoC to the receiving CoC.

Are the vouchers permanent?

Currently, the EHV program end date for each individual PHA is unknown and additional guidance regarding program wrap-up and closeout will be issued in the future. However, outer boundaries are known. For example, when a PHA no longer has any EHV families under lease and is not permitted to reissue any of its remaining EHV's due to the statutory September 30, 2023 reissuance prohibition, the PHA's program will have effectively ended, and all associated unexpended funds must be remitted to HUD.

EHV Applicant Eligibility

What is the applicant screening for the EHV's?

Under the EHV program, mandatory denials for EHV applicants include:

- 24 CFR 982.553(a)(1)(ii)(C), which prohibits admission 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.
- 24 CFR 982.553(a)(2)(i), which prohibits admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program.

HUD also allows PHAs to adopt permissive denials for EHV applicants. DHC intends to adopt the following as allowed in PIH Notice 2021-15:

Do HAs need an EHV Certification Form for Denials?

Yes. Once the EHV applicant is selected and referred to DHC, the Housing Assessment and Resource Agency (HARA) must provide the DHC with the required EHV certification. The HARA and/or referring service agency must maintain a copy of the certification from the partnering agency in the applicant's file along with other eligibility paperwork whether the applicant is denied or not.

Can some of our clients that are applying for CERA funds be eligible for the program?

The EHV's are specifically targeted to individuals and families that meet one of the following criteria:

- Homeless
- At-risk of homelessness
- Those fleeing domestic violence, dating violence, stalking, sexual assault, or human trafficking
- Recently homeless: defined as having previously been classified by a member agency of the CoC/LPB 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/LPB include, but are not limited to, participants in rapid rehousing, and permanent supportive housing.

If any of the above applies, individuals applying for CERA assistance may be eligible.

Will the standard at-risk definition apply to EHV or is there more flexibility?

Per PIH Notice 2021-15, the definition of at-risk includes:

The meaning of "at-risk of homelessness" is as such term is defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)), which is codified in HUD's Continuum of Care Program regulations at 24 CFR 578.3 and reads as follows:

At risk of homelessness. (1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) 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 the "Homeless" definition; and
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) 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;
 - (D) 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;
 - (E) 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;

(F) 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

(G) 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 (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); 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 (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

EHV Memorandum of Understanding (MOU)

May we select multiple service providers?

Yes, this is allowable. DHC updated the MOU to include more entries/signatories for service agencies and to include the HARA/Coordinated Entry Lead as a partner to the MOU.

Is the HARA the service provider?

The CoC/LPB will determine who has the capacity and experience to act as the service provider in accordance with the MOU; however, all EHV referrals must go through the HARA/Coordinated Entry System currently in place..

EHV Rental Units

Could this partnership include underutilized efficiency room/extended stay motels in our areas?

The unit selected by the individual/family must meet Housing Quality Standards (HQS) and program requirements. While it is possible for an individual to rent an efficiency unit, provided the unit meets all requirements as determined by DHC, the EHV's cannot be used in extended stay motels.

Is there enough housing for these clients to get them housed?

DHC and referring service providers must conduct extensive landlord outreach and recruitment to fill the vouchers. The service funds granted to the service provider can be used for housing search and landlord recruitment. DHC will continue to reach out to existing landlords to inquire about the availability of rental units and to educate them on the EHV program and the timing of placing individuals/families in homes. While some individuals/families have been in a housing search status longer than others, we do feel the housing stock is adequate for the EHV's.

EHV Service Funding

Can you explain the service funding?

HUD has provided each PHA with \$3,500 per voucher allocated to be used for eligible services as outlined in PIH Notice 2021-15. Through the MOU and subsequent grant agreement DHC has provided each CoC with \$3,000 per voucher allocated to their service area which is allowed per household for case management/staff costs and financial assistance to quickly lease-up the EHV individuals/families.

Will DHC provide Administrative Fees to CoCs for the EHV's?

HUD has confirmed this is not allowable. The service funding provided to the CoC can only be used for the activities outlined in the MOU.

Can ESG and ESC-CV Funds be used?

Under ESG-CV, households at risk of homelessness must have income less than 50% AMI. ESG and ESG-CV . Chosen service providers must utilize these or other eligible funds for security deposits for EHV households that qualify at or below these income levels. If a family's/individual's income is above 50% AMI but does not exceed 80% AMI, the EHV service funds may be used for security deposit assistance.

Should the agencies report EHV's to HMIS?

DHC does not report through HMIS and services provided under EHV service funding do not require HMIS data entry. However, if an agency is leveraging other resources (i.e., ESG or ESG-CV) to assist households in securing or maintaining EHV, you should report the activity in HMIS per the funding requirements.

Can EHV service fees be used for household appliances and/or home maintenance equipment?

DHC will allow the use of service fees for appliances such as a stove or refrigerator if the owner does not provide the appliances as part of the landlord/tenant lease; however, if the amount for the appliance exceeds \$600, the EHV service agency must obtain prior approval from DHC's Housing Specialist (Georgia Jenkins, jenkinsg@dhcmi.org) before purchasing the appliance.

DHC will not allow the use of service fees for the purchase of washer/dryers or any lawn maintenance equipment (i.e., lawnmowers, snowblowers).

Are utility arrearages covered under utility fees if required to get utilities placed in the voucher holder's name?

Yes, utility arrearages are a covered activity under the service funding.

Are bus tickets/tokens an allowable expense?

Yes. The service funding can be used for bus tickets or tokens for EHV individuals and families to view potentially available housing units during their housing search. Transportation costs can be tracked under case management – housing search within the [EHV Service Provider Report](#)

Can EHV service funds be used to pay off a debt owed to a landlord if that debt is preventing the EHV applicant from being approved for tenancy?

No. HUD has confirmed that the service funds may not be used for this purpose. PHAs and CoCs are encouraged to connect families to other services/programs that may help pay off a debtor arrearage.

When will the CoC/LPB find out their allocation of EHV's?

DHC has provided CoC/LPBs with their allocation of EHV's. However, EHV individuals/families can move anywhere in Michigan or port their voucher outside of the state of Michigan. The allocations provided reflect the initial allocations but there may be some fluctuation based on moves outside of the CoC/LPB service area.

Can voucher holders transfer to a different county?

Yes. If there is an EHV Service Provider in the area the household moves to, both service providers must communicate to verify that they are staying within the \$2,500 budget of EHV funding per household.

EHV Monthly Billing and Reporting Procedures

What must the fiduciaries submit to report their monthly expenses?

By the 15th of every month, each fiduciary must submit their FSR which should include the EHV FSR Billing Spreadsheet, Service Provider Report, and EHV General Ledger.

Do the service providers need a separate general ledger for EHV grant funding?

It is highly encouraged. EHV Program expenses should be coded separately from other grant fundings on your general ledger. These should be system generated or in another official manner to reflect the amount spent on this program and labelled "EHV." Since additional documentation support is not required for the monthly EHV FSRs, it is important that the program expenses are reported clearly.

Can service providers include benefits in your case management costs?

We will allow billing for the fringe benefits only to the extent that it's prorated for EHV staff hours, not in total for the payroll. Paid time off will not be an eligible expense.

Should I include a description of what services I am providing for financial assistance?

Yes, for more broad categories like furnishings and moving costs you should include a description of the items bought in either your general ledger or a separate supporting document for review. Most of the other categories label clearly what the expense was for.

Why is Housing Stability Support included in the Service Provider Report as case management but there is not a place to report the expenses in the EHV FSR?

Housing Stability Support includes the services provided to the EHV holder **6 months after they have been leased.**

According to the MOU for the EHV Program, Service Providers are responsible to "Identify and provide supportive services to EHV individuals and families for a period of up to six (6) months after initial lease-up to ensure individuals and families remain stably housed. (While EHV participants are not required to participate in services, the Service Provider should assure that services are available and accessible.)" Therefore, service agencies should document Housing Stability Support in their Service Provider Report.

However, expenses for this service do not apply to the EHV Program. HUD has stated that EHV funds cannot be used for services provided after an EHV family is housed. Service agencies should leverage other funding for any housing stability support services provided.

EHV Waiting Lists

How much leeway do we have in determining prioritization?

Each CoC/LPB will have the ability to prioritize at the Coordinated Entry System level. Once an applicant is referred to DHC they will be served based on date and time of submission. Names will be placed on the waiting list once the referrals meet voucher allocation capacity.

Can applicants who were placed on the EHV WL be removed from the HCV Program WLs once they are pulled for the EHV?

No. DHC cannot remove or deactivate an EHV applicant from another WL just because they have been referred for the EHV. If their name reaches the top of another DHC WL and they are already housed, then DHC must contact them regarding the waiting list selection and the family has the right to decide to remain with EHV or utilize a the selected housing program.

What happens if an applicant is drawn from the EHV and HP WL at the same time?

While we do not expect to see this frequently, it is possible for this to happen. In these cases, the DHC and service agency(ies) should educate the individual/family on the differences and advantages of both programs. Ultimately, it is the individual/family's decision which program they wish to pursue. The family should place their decision in writing and/or the conversation with the family should be documented for the DHC applicant file. DHC will then update the waiting list programs and continue with EHV.