

HUD-VASH

Department of Housing and Urban Development (HUD) & Department of Veterans Affairs (VA) Supportive Housing Program



HUD – VASH 101

An Introduction to the Program

January 24th, 2012



Presenters





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Overview of the webinar

- Produced in conjunction with the HUD SNAPs office's "Ready SET Go! Series"
- Will cover basic information on HUD-VASH and how it's different from the regular HCV program.
- Some of the information covered may only be relevant to public housing agencies (PHAs).



Instructions and FYIs



- Webinar will last approximately 1 ½ hours.
- We are being recorded! Within a few weeks, the recording will be posted to HUD's program webpage at <u>http://www.hud.gov/offices/pih/programs/hcv/vash/</u>
- A feedback survey will be e-mailed following this webinar.



Instructions and FYIs



- Audience members are muted due to the high number of participants
- If you have technical difficulty with the audio or video portions of this Webcast, try:
 - Logging off, then logging in again
 - Using the phone for audio
 - Requesting TA through the "questions" function in the "Go To Webinar" toolbar





- If you have a question for HUD and VA staff, use the "Questions" function in the "GoToWebinar" toolbar.
 - Questions will be answered during the <u>designated times</u> in our webinar agenda.
 - However, you can write and send your questions to us at any time.
- If you have a question that is not answered during the webinar, you may ask your local HUD field office or VA Network Homeless Coordinator.



Training Agenda



- 1. Introduction
- 2. VA Background and Case Management
- 3. Questions
- 4. HUD Background and HUD-VASH Operating Requirements
- 5. Questions
- 6. HUD-VASH PBVs and PHA Reporting Requirements
- 7. HUD-VASH FAQs
- 8. Questions

Resources

Handouts:

- HUD-VASH Operating Requirements
- HUD-VASH Handbook (VHA Handbook 1162.05)
- Notices PIH 2011-50, 2011-53, and 2011-54
- HUD-VASH Qs and As

Websites:

http://www.va.gov/HOMELESS/HUD-VASH.asp www.hud.gov/offices/pih/programs/hcv/vash/

HUD-VASH List Serve:

http://www.hud.gov/subscribe/mailinglist.cfm

VA SharePoint for HUD-VASH (for VA staff only): http://vaww.national.cmop.va.gov/MentalHealth/HUDVASH



HUD-VASH 101



VA Background and Case Management



HUD-VASH Background



VA and HUD Commitment

- The Five-Year Plan to Eliminate Homelessness among Veterans calls for coordinated, collaborative efforts with community partners, including local, state and federal government agencies.
- The Department of Housing and Urban Development (HUD) and Department of Veterans Affairs (VA) work together on the U.S. Interagency Council on Homelessness
- VA and HUD have established High Priority Performance Goals that measure the impact of their programs on Veteran homelessness







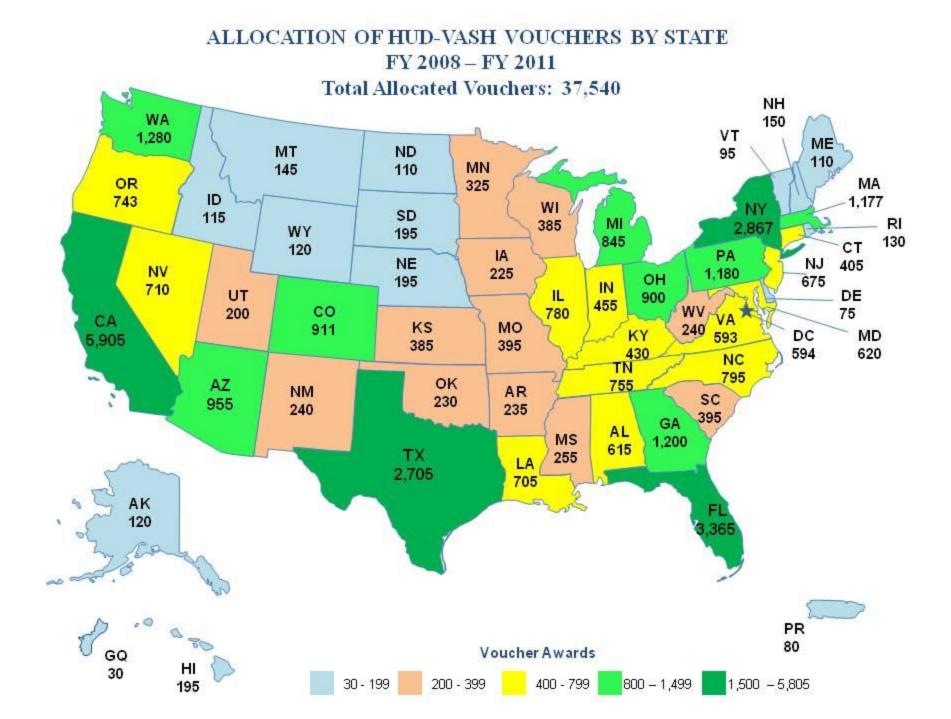
Housing plus supportive services

- The nation's largest supported permanent housing initiative combines:
 - HUD Housing Choice Vouchers

VA case management services that promote and maintain recovery and housing stability

- Over 37,540 Housing Choice vouchers awarded to date
- A total of 323 participating PHAs
- VA has funded 1,543 case managers/other staff across the country

In 2010, added 101 Substance Use Disorder Specialists to VA case management and supportive services







HUD-VA High Priority Goal:

Place 30,000 Veterans in permanent housing through HUD-VA Supported Housing (HUD-VASH)

Time period: October 1, 2009 – June 30, 2012

Report to Office of Management and Budget on a quarterly basis

- # of referrals from VAMCs to PHAs
- # of vouchers issued to families
- # of units leased

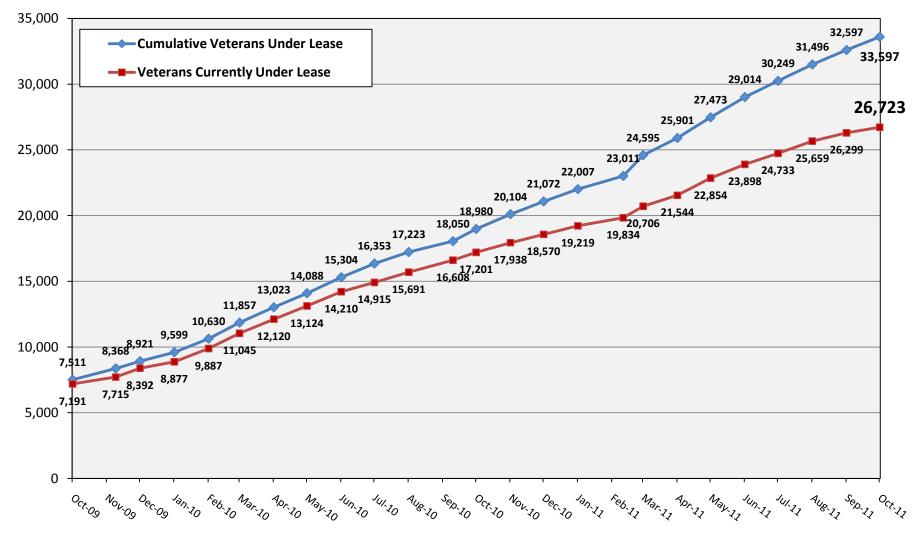


HUD-VASH Veterans Under Lease

Cumulative and Point In Time

October 2009 - October 2011

*Draft report as of 11/8/2011. October 2011 Cumulative is incomplete









PARTNER RESPONSIBILITIES

- VA Case Managers determine clinical eligibility and homeless status. Primary focus is assisting those who are chronically homeless
- PHAs determine if the Veteran meets HUD criteria for income and is not a lifetime registered sex offender under a State sex offender registration program.



VA Eligibility



Criteria:

- Eligible for VA Health Care
- Homeless per McKinney Vento definition
- Identified need for case management to successfully live in community housing
- Agreement to participate in program of recovery and case management



VA Eligibility



Homeless Emergency and Rapid Transition to Housing (HEARTH) Act

- Signed by President Obama May 20, 2010
- Reauthorizes McKinney Vento Act (previous authorization for homeless programs)
- Updates and changes many elements defined in McKinney Vento, including definition of "homeless" and "chronic homelessness"
- More information available on HUD's homeless resources website: <u>http://www.hudhre.info/</u>



VA Eligibility



- Is NOT predicated on the following:
 - -Length of sobriety
 - Treatment compliance
 - Prior treatment in other homeless programs
 - Income verification by VA
 - Criminal Background Check



Case Management



Housing First Model

Housing First offers:

- Permanent housing with supportive & treatment service to homeless individuals or families,
- Few requirements for treatment participation prior to housing
- Priority and focus is on housing

http://www.endhomelessness.org/section/tools/housingfirst



Case Management



Goals:

- Establish a therapeutic relationship that promotes access, respect and hope
- Provide support for long-term recovery by working toward housing recovery plan goals
- Reassess needs and goals based on changing conditions
 - Inability to maintain sobriety does not generally lead to discharge from case management if Veteran can maintain housing
 - Veteran may require brief intervention or higher level of care
- Foster community integration and independence
- Main Goal: Veteran sustained in permanent housing





Housing Recovery Plan

- Once accepted, a Housing Recovery Plan is developed by the case manager and the Veteran. It is an integrated part of the overall treatment plan, and reflects the recovery goals of the Veteran which may include:
 - Establishing Housing stability (rent paid, following rules, etc)
 - Meeting employment and income needs
 - Resolving legal and financial issues (credit history)
 - Supporting physical, mental, social health
- Agreement on process to monitor the progress of the plan





Steps to Prepare Veterans for PHA Referral

-Gather items required to obtain voucher and secure housing:

- **o Identification (Photo)**
- \odot Income and Benefits
- Credit History and Repair

-When functionally indicated, the Case Manager assists with:

- \odot Completing Housing Authority application forms
- \odot Assisting with transportation
- Addressing obstacles and barriers
- \odot Providing organization to the process
- \odot Facilitating communication between PHA and Veteran





Coordinate VA and community interventions

- Act as a liaison with critical partners
 - \circ Landlord
 - $\ensuremath{\circ}$ Other service providers

Make regular home visits to assess Veteran's ability to maintain in a safe environment that promotes

Housing Stability
Social Connection
Recovery





Case Management



- Regular re-assessment by Case Managers
- Revision of treatment plan as:
 - Goals reached
 - Treatment needs change
 - Veteran's goals change
 - Veteran becomes more independent
 - Level of care changes









HUD-VASH assistance may be terminated if the family refuses, without good cause, to participate in required case management as verified by the VAMC.



Termination



As Veterans stabilize:

- May need longer "trial" periods without case management to determine their ability to manage independently
- May have case management services stop following mutual agreement that
 - Goals and objectives have been met
 - Veteran has been able to independently sustain housing
 - Veteran no longer requires supportive case management services







A **VAMC's determination** that case management is no longer needed is <u>not</u> grounds for termination of Housing Choice Voucher assistance.

- If PHA has other HCV vouchers they may give it to the Veteran. The Veteran family is not subject to the PHA's waiting list because they are already a participant in the PHA's HCV program.
- HUD-VASH will then get the original voucher back to use with another eligible homeless Veteran
- If PHA does not have alternative voucher, Veteran would continue with HUD-VASH voucher until it was no longer needed



HUD-VASH 101



Questions



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HUD Background and HUD-VASH Operating Requirements





- Between 1992 and 1994, more than 1,700 HUD-VASH vouchers were awarded to 35 PHAs for the "original" HUD-VASH program.
- Homeless Veterans were <u>required</u> to have severe psychiatric or substance abuse disorders in order to be eligible for the program.
- Clinical services also were provided by the VA.
- In 2008, more than 1,000 Veterans were still assisted as a result of that HUD-VASH initiative.





- In the Consolidated Appropriations Act of 2008, Congress provided \$75 million to HUD to assist approximately 10,000 homeless Veterans in a "new" HUD-VASH program.
- The FY 2008 HUD Appropriations gave HUD:
 - The flexibility to waive regulatory and statutory provisions that would impede program operations
 - The ability to establish alternative program procedures





- Based on the 2008 Appropriations language, the VA identified 132 VA medical centers to participate - at least one site in every state and also in DC and Puerto Rico.
- HUD then invited a PHA in the jurisdiction of each VA medical center to apply for vouchers.
- Since FY 2008, Congress has provided new funding annually for additional HUD-VASH vouchers, including \$75 million for new HUD-VASH vouchers in FY 2012.
- Every year, communities receiving HUD-VASH vouchers are selected based on <u>geographic need</u>, using homeless Veteran data provided by HUD's Homeless Programs office and the VA.





- HUD-VASH Operating Requirements were published in the Federal Register at Docket No. FR-5213-N-01 on May 6, 2008.
- A correction was published on May 19, 2008.
- Outlines waivers and alternative requirements for the HUD-VASH vouchers.
- Normal HCV requirements of 24 CFR 982 apply if not waived or if no alternative requirement is specified.





VAMC referrals to PHA

- Eligible homeless Veterans that agree to participate in VA case management are referred to the VAMC's partner PHA.
- The PHA must maintain written documentation of VAMC referrals in their HUD-VASH tenant files.





PHA screening

- PHAs only screen for income eligibility and for lifetime registration under a state sex offender registration program and can only deny issuance of a voucher for those reasons.
- Under portability, the receiving PHAs must also comply with VASH screening requirements





PHA screening

- PHAs <u>cannot</u> screen for or deny issuance of a voucher for money owned to the PHA or for criminal or drug activity.
- A PHA <u>cannot</u> deny issuance of a voucher or admission into the program for zero income status.





Income – minimum rent

- A PHA can charge a minimum rent of up to \$50
- However, if a Veteran is awaiting notification about the receipt of VA benefits or other forms of assistance, the PHA <u>must</u> grant the Veteran a hardship exemption.
- See 24 CFR 5.630 (3)(b).
- In such cases, a PHA <u>cannot delay</u> voucher issuance or admission until the benefits are received.





Income

- The PHA must determine income eligibility for HUD-VASH families in accordance with 24 CFR 982.201.
- PHAs should discuss these requirements with their partner VAMCs.
- HUD income limits do not apply at reexams.





Income

- Income targeting requirements do not apply to HUD-VASH vouchers.
- However, a PHA <u>may choose to include</u> the admission of extremely low income HUD-VASH families in its income targeting numbers for the FY of a family's admittance.





Lifetime sex offender registration

- If the homeless Veteran is subject to state lifetime registration – PHA cannot issue HUD-VASH voucher to the Veteran.
- If another family member is the lifetime registrant family may be eligible for voucher if the family member subject to the registration requirement is removed from the household.





Issuance of voucher or denial of assistance

- PHA must either issue a voucher to the referred Veteran or deny assistance.
- For denials, the PHA must promptly send a denial notice that states the reason and provides for an informal review.
- A copy of this notice must be provided to the VAMC case manager.





Voucher issuance - initial search term

- Must have an initial term for housing search of at least 120 days.
- Any extensions, suspensions and progress reports will remain under the policies in the PHA's administrative plan, but will apply only after the initial 120-day term.





Admission and initial lease term

- Initial leases may be for <u>less than</u> 12 months even if this is not the prevailing market practice.
- Point of program "admission" is when unit selected by the Veteran comes under Housing Assistance Payments Contract and lease.





Eligible housing

- Standard HCV requirements regarding unit size, HQS and payments standards apply. (HUD publication: "A Good Place to Live")
- However, VA-owned units on the grounds of a VAMC are eligible housing for the HUD-VASH program. 24 CFR 982.352(a)(5) has been waived for HUD-VASH.





Turnover of voucher when Veteran leaves program

 Upon turnover, HUD-VASH vouchers must continue to be issued to eligible Veteran families referred by the VAMC.





Portability

- Two types of portability/mobility in HUD-VASH based on whether the family moves within or outside the referring VAMC's catchment area.
- The referring VAMC **must always be consulted** prior to a portability move.





Moves WITHIN the catchment area of the referring VAMC

- Veteran can live in the jurisdiction of another PHA within the referring VAMC's catchment area if the referring VAMC will continue to provide case management.
- The receiving PHA <u>must bill</u> the initial PHA if it does not administer HUD-VASH vouchers of its own.





Moves WITHIN the catchment area of the referring VAMC

- If the receiving PHA administers HUD-VASH vouchers, the receiving PHA <u>may either absorb the family or bill</u> <u>the initial PHA.</u>
- In either case, the VA must be consulted prior to the move and agree that case management services will be provided.





Portability Form HUD-VASH Attachment

- An attachment to the HUD Portability Form (form HUD-52665) for the HUD-VASH program is posted on the HUD-VASH webpage.
- It summarizes the alternative requirements that apply to portability moves where the family's case management is being provided <u>by the initial PHA's</u> <u>partnering VAMC.</u>







Moves OUTSIDE of the referring VAMC's catchment area

- The VAMC that screened the Veteran must first confirm that the new VAMC has an available HUD-VASH case management slot and that the new VAMC's partner PHA has an available HUD-VASH voucher.
- The receiving PHA <u>must administer HUD-VASH vouchers</u>. The family cannot move under portability if there is not a VASH PHA in the area to which the family wishes to move.







Moves OUTSIDE of the referring VAMC's catchment area

- After acceptance of the Veteran by the new VAMC for case management, the new VAMC will refer the Veteran to its partner PHA. That PHA will issue the Veteran one of its HUD-VASH vouchers.
- The family must be treated as **absorbed** by the new PHA, <u>never as a billing arrangement with the old PHA</u>.
- The initial PHA's voucher stays with the initial PHA.





MTW Agencies

- HUD-VASH vouchers must be administered in accordance with HUD-VASH notices.
- They are not eligible for fungibility under an agency's MTW agreement and must be reported separately from MTW vouchers.





SEMAP

- Since leasing of HUD-VASH vouchers will be dependent on referrals from the VAMC, the unit months and budget authority associated with the HUD-VASH vouchers will NOT be included in the SEMAP leasing indicator.
- Utilization of the HUD-VASH vouchers will be monitored separately.



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Questions



HUD-VASH 101



PBVs and PHA Reporting Requirements





- HUD published PIH 2011-50 on project-basing HUD-VASH vouchers, effective September 15, 2011.
- Notice PIH 2011-54, effective September 20, 2011, provides general guidance on the overall PBV program.





Limits on project-basing

- Previously, only 50% of a PHA's HUD-VASH allocation of tenant-based vouchers could be project based.
- This limitation was <u>lifted</u> in Notice 2011-50.
- HUD-VASH PBV units are counted in the maximum 20 percent of voucher budget authority that may be project based.





Proposals

- Prior to submitting a proposal to HUD headquarters, the VAMC and VA Regional Manager must be in agreement with the PHA's proposal
- When submitting these requests, they must be signed by:
 - the PHA Executive Director (or equivalent official)
 - the VAMC or Veterans Integrated Service Network (VISN) Director and
 - the VA Network Homeless Coordinator.
- The VA officials may include letters of support in lieu of signing the proposal cover letter.



Project-Based Vouchers (PBVs)



Proposal content

- Proposals may be for existing, new construction and substantially rehabilitated units.
- Must include:
 - Explanation of why the PHA wants to project-base the vouchers rather than provide tenant-based assistance
 - Success rate of HUD-VASH voucher holders and other voucher holders
 - Utilization rate in SEMAP
 - Amount of time, if any, HUD-VASH vouchers would be shelved for development
 - A description of the project (details in Notice PIH 2011-50)





Assistance to families that move from PBV unit

- PBV regulations provide that a family may terminate the lease anytime after the first year of occupancy.
- The PHA must offer the family continued tenantbased assistance in the form of a voucher or comparable tenant-based rental assistance.
- HUD-VASH family that no longer requires case management cannot be terminated for this reason.





Assistance to families that move continued:

- The PHA may offer the family a regular voucher to free up the HUD-VASH voucher. If a regular voucher is not available, the family retains its HUD-VASH voucher.
- If a HUD-VASH voucher is not available at the time the family wants to move, the PHA could require the family to wait 180 days for a HUD-VASH voucher.





Assistance to families that move continued:

- If a HUD-VASH voucher is still not available, the family must be allowed to move and the PBV assistance would be replaced with a regular voucher assistance unless the unit is taken out of the PBV contract.
- If after 180 days, a HUD-VASH voucher does not become available and the PHA does not have sufficient funding to attach assistance to the PBV unit, the family may be required to remain in its PBV unit until such funding becomes available.





- This section applies to HUD-VASH reporting for PHAs into the PIH Information Center (PIC) and Voucher Management System (VMS).
- VAMCs report Veterans' case management data into Homeless Operations Management and Evaluation System (HOMES).
- HUD and VA regularly compare PHA and VAMC leasing data to check for discrepancies.
- The points that follow reflect the most recent notice on reporting, PIH 2011-53, published on September 20th, 2011.





VASH code for form HUD-50058

- The code, "VASH," has been established for use on line 2n to indicate that the family is participating in a special program
- Code must remain on the form for the duration of the family's participation in the program by the initial and receiving PHA (if voucher is ported)





Reporting voucher issuance

- At the time a voucher is issued to a Veteran, PHAs must report the issuance in form HUD-50058 by entering VASH in field 2n and code 10 (issuance of voucher) in field 2a.
- The reporting of voucher issuance enables HUD and VA to monitor the length of time it takes for a Veteran to become housed after s/he is determined eligible for the program.



HUD-VASH Reporting



Reporting lease-up

- When a HUD-VASH family finds an apartment and the lease is signed, the PHA must enter code 1 (new admission) on line 2a.
- The VASH code must be maintained on line 2n throughout the participation of the family.
- If the HUD-VASH family no longer requires case management services, and the PHA has the funding and elects to serve the family under its regular HCV program, the PHA no longer uses the VASH code on line 2n.





Reporting in cases of portability

- If the Veteran never leased up in the initial PHA's jurisdiction, the receiving PHA must enter code 1 (new admission) on line 2a.
- If the Veteran did lease up in the initial PHA's jurisdiction, the receiving PHA must enter code 4 (port-in) on line 2a.
- The code VASH must be entered and maintained on line 2n.





Reporting in cases of portability

- Receiving PHA is also required to enter a 50058 report in PIC for action code 10 (issuance of voucher) on line 2a, as well as continue to enter VASH on line 2n.
- Receiving PHA, if not administering VASH vouchers, must always bill the initial PHA for tracking purposes.
- If the initial PHA believes that the receiving PHA either mistakenly absorbed the family or failed to enter the VASH code, the local HUD Field Office or Headquarters should be contacted.



HUD-VASH Reporting



VMS Reporting

- HUD-VASH vouchers leased and HUD-VASH HAP expenses are to be reported to VMS monthly using the appropriate VMS fields.
- In VMS, the PHA should report all families that are supported by HAP funds under its own ACC. This would include families that are being served within the PHA's jurisdiction as well as families for which it is billed under portability.



HUD-VASH Reporting



VMS Reporting

- The UML and HAP of a HUD-VASH voucher that has ported out (for which the PHA is being billed) should be reported in the VASH field, not the port-out field
- Each PHA must retain appropriate records to support VMS submissions as they are subject to on-site review by HUD.
- VMS data are subject to review by our Quality Assurance Division (QAD). Recalculation will occur if a QAD review demonstrates that costs were incorrectly reported resulting in excess funding.



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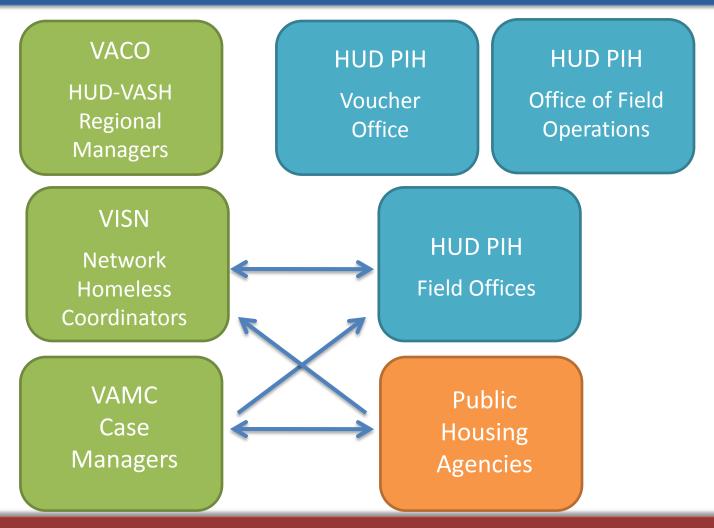


HUD-VASH Frequently Asked Questions



Program Structure









- What is the primary goal of HUD-VASH?
 - To end Veteran homelessness
 - To obtain and sustain the Veteran in permanent housing.







- If a Veteran is interested in participating in the HUD-VASH program, who should he or she contact?
 - Any interested homeless Veterans should contact their local VAMC directly. HUD has posted a list of VAMCs and participating PHAs on the HUD-VASH website.
 - Also, the Veteran can call National Call Center for Homeless Veterans hotline: 1-877-424 3838 or 1-877-4AID VET





- Is staying with a family member or friend considered an episode of homelessness?
 - If a Veteran is staying with family or friends , a.k.a. "couch surfing", that in itself does not constitute an episode of homelessness, but it is the act of being evicted that counts as an episode of homelessness.
 - In this situation, the legal owner or tenant should write a letter stating their intent to no longer allow the Veteran to stay in the home. This provides documentation of the "eviction" and supports the episode of homelessness.



Frequently Asked Questions



- O Veterans need birth certificates and social security cards to complete the identification requirements for the voucher application?
 - HUD regulations at 24 CFR 5.216(g) only require that families provide an original, government-issued document that includes the social security number.
 - The document can be issued by a federal, state, or local government agency.
 - The VA's DD-214 form qualifies.
 - PHAs may require additional identification, but because HUD regulations are flexible, we encourage PHAs to save time and accept the minimum required.





- Why doesn't a Veteran have to participate in or finish treatment before getting permanent housing?
 - It is more effective to house a Veteran first ("Housing First") and then provide treatment services
 - Treatment is more manageable when the person is housed (medication management, decreased stress, etc.)
 - Keeping the housing becomes a treatment incentive.





- I'd like to provide housing for homeless Veterans in a building that I own. Can I apply for HUD-VASH funding to assist me with this project?
 - No. Only PHAs can receive and administer HUD-VASH voucher funding.
 - If a PHA in your community has received HUD-VASH vouchers, the PHA and partnering VAMC may have decided that there is a need to project-base some of the vouchers. Contact the administering PHA to find out if that is the case.
 - It is required that the PHAs hold a competition for the awarding of PBVs.







- Is it acceptable for the VA case managers to review original documents on the PHA's behalf?
 - The PHA is responsible for income and citizenship verifications. The case manager may compile the documents and look them over, but the PHA has the final say regarding their appropriateness.







- What procedures must the PHA follow when adding a member to the assisted HUD-VASH family?
 - The provisions of 24 CFR 982.551(h)(2) apply when a family member is added after occupancy.
 - Other than the birth, adoption, or court-awarded custody of a child, any other family member must be approved in accordance with the PHA's policies.







- Can a participant use a HUD-VASH voucher to move long distance? For example, a HUD-VASH family wants to move from California to Florida.
 - This type of move is permissible if the Florida VAMC can serve the family and its partnering PHA has an available HUD-VASH voucher. The receiving PHA in Florida must absorb the family.







- Open being issued a HUD-VASH voucher, does a Veteran need wait a year before he or she can move under portability to another PHA's jurisdiction?
 - No. 24 CFR 982.353(c) has been waived for HUD-VASH. A non-resident Veteran does not need to lease-up with a HUD-VASH voucher in the jurisdiction of the initial PHA for one year before porting.
 - In addition, Veterans are not required to enter into an initial lease with an owner for one year, as 24 CFR 982.309(a)(2)(ii) also has been waived for HUD-VASH.





- Can the earnings of Veterans participating in Compensated Work Therapy (CWT) programs, including Incentive Therapy (IT), be excluded as income under 5.609(c)(9)?
 - Participation in CWT is based on the treatment needs of the individual Veteran and the judgment of the treatment team.
 - Therefore, the number of hours per week/month, the length of participation, and the number of times the Veteran participates in such programs varies widely among Veterans.







- Because circumstances of Veterans' participation vary widely, it is up to the PHA to determine if a specific Veteran's earnings under CWT qualify as temporary, nonrecurring or sporadic income in accordance with PHA policy.
- For other questions on VA benefit programs and income exclusions, see the Qs and As published on HUD's website for HUD-VASH.

http://www.hud.gov/offices/pih/programs/hcv/vash/





• How long does HUD-VASH last?

- VA case management lasts as long as the Veteran clinically needs it, although the focus is to reintegrate the Veteran into the community, utilizing community supports.
- The Veteran family may use the HUD-VASH voucher as long as it is needed and the Veteran family continues to meet PHA criteria.







- Upon the Veteran's completion of case management, the PHA can use one of its regular HCV program vouchers, if available, to continue assisting the family.
- This would free up the HUD-VASH voucher for another eligible Veteran family.





- When a HUD-VASH family no longer needs case management and converts to the regular HCV program, is the family subject to the PHA's waiting list?
 - No, the family is not subject to the PHA's waiting list, because the family is already a participant in the PHA's HCV program.







- What happens to the voucher if the homeless Veteran dies?
 - The PHA could use one of its own vouchers, if available, to continue assisting this family and free up the HUD-VASH voucher for another Veteran family.
 - If a regular voucher is not available, the family would continue utilizing the HUD-VASH voucher.
 - Once the HUD-VASH voucher turns over, however, it must go to a homeless Veteran family.





What happens to the voucher if there is a divorce?

• Since HUD-VASH vouchers are for Veterans, the voucher must remain with the Veteran in the case of a separation of divorce.





Can a PHA terminate a family at the time of a reexamination for a violation that occurred before the HUD-VASH program?

Example: The family owes money to the PHA. The PHA cannot deny admission for that reason, but would like to terminate the family at reexam time.

• A PHA cannot terminate a family for a reason that cannot be used for denying admission.





- However, a HUD-VASH family can be terminated for program violations that occur <u>after</u> the family is admitted to the HUD-VASH program.
- Prior to any termination action, the PHA is strongly encouraged to contact the VA case manager to determine if there are extenuating circumstances that should be considered to avoid the termination.







- Can a PHA refuse to readmit Veterans that have been terminated from the HUD-VASH program due to serious lease violations, program fraud, criminal activity, etc?
 - In accordance with the HUD-VASH Operating Requirements, a PHA cannot deny HUD-VASH assistance to a Veteran for any grounds under 24 CFR 982.552 and 982.553.





- Therefore, for any reason other than the family being income ineligible and/or a member being subject to a lifetime sex offender registration requirement, the PHA may <u>not</u> deny HUD-VASH assistance to a Veteran that is re-referred by the VA case manager.
- In order to avoid such cases, prior to the PHA's termination of the Veteran, HUD recommends that the PHA contact the VA case manager to discuss the reasons for the Veteran's potential termination.





- The PHA and VA case manager should work together to agree on the appropriate action and determine if termination of the Veteran's assistance can be avoided.
- If it is decided that termination is the appropriate action, the PHA staff and VA case manager should discuss the circumstances under which, if any, the VA may choose to re-refer the Veteran family.







• Will HUD-VASH vouchers be fully renewed?

 It is the HUD's intent to fully renew all HUD-VASH vouchers. However, such renewals are always subject to Congressional appropriations.





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Questions