

# OEO Housing Opportunity Grant Program Training September 2018

WELCOME!

# HOP Program Eligibility

## HOP Eligibility-- Three Aspects:

1. Eligibility Policies and Procedures
2. Documenting the Applicant's Eligibility
3. Documenting Eligibility Determinations by Staff

# Why Policies and Procedures?

- Helps to insure the implementation of efficient and effective programs
- Appropriate use of limited public resources
- Consistency of practices, avoid potential or perceived discrimination
- Chart the course to get through the bumpy times
- Help new staff
- Avoid the need to return funds to HUD (Yikes!)

# HOP Policy & Procedure Requirements

|  |
|--|
| <b>All Programs</b>  |
| Eligibility Determinations (Criteria and Process)  |
| Confidentiality, including security of files.  |
| Termination of Services  |
| Employee - Nondiscrimination & Equal Opportunity Employment  |
| Guest - Nondiscrimination  |
| Conflict of Interest – covering all staff & board  |
| Affirmative Outreach Plan  |
| <b>For Emergency Shelters:</b>   |
| Admission  |
| Discharge  |
| Diversion & Referral   |
| Length of Stay   |
| Shelter Safety and needs Assessment Specific Populations   |
| Coordination Among Shelters and Service Providers  |
| <b>For Essential Service Providers:</b>  |
| Assessing Need and Reassessing Need  |
| Prioritizing Individuals Needs   |
| <b>For Providers of Homelessness Prevention &amp; Rapid Re-housing:</b>  |
| Use of Coordinated Entry to prioritize households for services   |
| Determining Assistance: <ul style="list-style-type: none"> <li>▪ Amount</li> <li>▪ How Adjusted Over Time</li> <li>▪ What % or amount of rent or utilities will be paid by participant.</li> </ul> |
| General Grievances and Appeals Process (Program Participants)  |
| <b>Additional Recommended Policies and Procedures</b>  |
| Recordkeeping  |
| Record Retention   |
| Whistleblower Policy   |

## Eligibility Policies and Procedures Must Outline:

1. Eligibility Criteria
2. Eligibility Determination Process:
  - Who
  - How, and
  - When

Grantees may adopt standards that are more restrictive than HOP standards, but they can not be less restrictive.

## **Three Documents that outline HOP Eligibility Criteria**

- 1. Eligible Uses Table** (used for all program types)
- 2. Definition of Homelessness Table** (used for all program types)
- 3. Definition of At Risk Table** (additional criteria for HP)

## Three options for Incorporating Requirements:

1. **Insert** HOP Eligibility Criteria into your documents.
2. **Attach** Tables to your documents and reference them.
3. **Reference** AHS documents in your documents.

| HOP ELIGIBLE USES CHART  |   |   |  |
|--|---|---|--|
| (see Grant Agreement for specific allowable activities and limitations)  |   |   |  |
| EMERGENCY SHELTER  | RAPID RE-HOUSING  | HOMELESSNESS PREVENTION   | TRANSITIONAL HOUS.   |
| <p>Individuals and Families <b>defined as Homeless</b> under the following categories:</p> <ul style="list-style-type: none"> <li>• Category 1 - Literally Homeless</li> <li>• Category 2 - Imminent Risk of Homeless</li> <li>• Category 3 - Homeless Under Other Federal Statutes</li> <li>• Category 4 - Fleeing/Attempting to Flee DV</li> </ul> | <p>Individuals and Families <b>defined as Homeless</b> under the following categories:</p> <ul style="list-style-type: none"> <li>• Category 1 - Literally Homeless</li> <li>• Category 4 - Fleeing/Attempting to Flee DV (where criteria is also met for Category 1)</li> </ul> <p><b>No Income Requirement.</b></p> | <p>Individuals and Families <b>defined as Homeless</b> under the following categories:</p> <ul style="list-style-type: none"> <li>• Category 2 - Imminent Risk of Homeless</li> <li>• Category 3 - Homeless Under Other Statute</li> <li>• Category 4 - Fleeing/Attempting to Flee DV</li> </ul> <p>Individuals and Families who are <b>defined as At Risk of Homelessness</b></p> <p>In addition, all individuals and families <b>must have an annual income below 30% AMI</b> (Up to 10% of HH assisted may be up to 50% AMI)</p> | <p>Individuals and Families <b>defined as Homeless</b> under the following categories:</p> <ul style="list-style-type: none"> <li>• Category 1 - Literally Homeless</li> <li>• Category 2 - Imminent Risk of Homeless</li> <li>• Category 3 - Homeless Under Other Federal Statutes</li> <li>• Category 4 - Fleeing/Attempting to Flee DV</li> </ul> |

- References to Categories 1, 2, 3, and 4 point to HUD's **Definition of Homelessness**.
- Homeless Prevention (HP) also references the **At-Risk** of Homelessness criteria.

**APPENDIX A. DEFINITION OF HOMELESSNESS**  
*Published by HUD - November 15, 2011; Adopted by the Vermont Agency of Human Services*

|   |            |   |   |
|---|------------|---|---|
| <b>CRITERIA FOR DEFINING HOMELESSNESS</b> | Category 1 | Literally Homeless                            | <p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>(i) Has 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;</li> <li>(ii) Is living in 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); <b>OR</b></li> <li>(iii) Is exiting an institution where (s)he 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.</li> </ul>  |
|   | Category 2 | Imminent Risk of Homelessness                 | <p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; <b>AND</b></li> <li>(iii) 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.</li> </ul>  |
|   | Category 3 | Homeless under other Federal statutes         | <p>(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:</p> <ul style="list-style-type: none"> <li>(i) Are defined as homeless under the Runaway and Homeless Youth Act (42 U.S.C. 5732a, section 387), the Head Start Act (42 U.S.C. 9832, section 637), the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2, section 41409), the Public Health Service Act (42 U.S.C. 254b(h), section 330(h)), the Food and Nutrition Act of 2008 (7 U.S.C. 2012, section 3), the Child Nutrition Act of 1966 (42 U.S.C. 1786(b), section 17(b)) or McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a, section 729);</li> <li>(ii) 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;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during the preceding 60-days; <b>AND</b></li> <li>(iv) 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 GED, illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.</li> </ul> |
|   | Category 4 | Fleeing/ Attempting to Flee Domestic Violence | <p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;</li> <li>(ii) Has no other residence; <b>AND</b></li> <li>(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.</li> </ul>   |

**APPENDIX B. DEFINITION OF "AT RISK OF HOMELESSNESS"**

*HUD Interim ESG Regulation – Congruent with definition adopted by Vermont Agency of Human Services*

|  |            |                                  |   |
|--|------------|----------------------------------|---|
| <b>CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS</b> | Category 1 | Individuals and Families         | <p>An individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Has an annual income below 30% of median family income for the county; <b>AND</b></li> <li>(ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; <b>AND</b></li> <li>(iii) Meets one of the following conditions: <ul style="list-style-type: none"> <li>(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <b>OR</b></li> <li>(B) Is living in the home of another because of economic hardship; <b>OR</b></li> <li>(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <b>OR</b></li> <li>(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <b>OR</b></li> <li>(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <b>OR</b></li> <li>(F) Is exiting a publicly funded institution or system of care.</li> </ul> </li> </ul> |
|  | Category 2 | Unaccompanied Children and Youth | A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.   |
|  | Category 3 | Families with Children and Youth | A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.   |

# Documenting Eligibility

## **When Monitoring, OEO is Looking for:**

1. Documentation of the Applicant's Eligibility
2. Documentation of Staff's Eligibility Determination

## **Documentation of Applicant Eligibility - HUD's Preference:**

1. 3<sup>rd</sup> Party (not expected for emergency shelter)
2. Intake Worker Observation;
3. Self-Certification;

## Examples of 3rd Party Documentation:

### Shelter:

- For imminent risk: a copy of a **Notice to Quit** or **Eviction Order** stating that the tenant must vacate within 14 days

### Rapid Re-housing:

- A phone call to a shelter confirming that the applicant is staying there

### Homelessness Prevention:

- Copy of a **Notice to Quit** or **Eviction Order** stating that the tenant must vacate within 21 days
- Copy of a disconnect notice from the utility company
- Copy of a bank statement showing a lack of resources

## **Examples of Intake Worker Observation:**

**Shelter:** Staff saw that individual is living in a car or tent;

**Rapid Re-housing:** Staff aware that the applicant is staying in the organization's shelter.

## **Self Certification**

- Acceptable if third party or intake worker observation not readily available
- Most frequent type of documentation for Domestic Violence shelters
- Frequently used for Supports and Resources test when no other option

# **How To Document Self Certification? (one option)**

**Self-Declaration of Housing Status**

Applicant's Name: \_\_\_\_\_

Family Type (circle one):    Adults Only    Adult(s) with children    Household Size: \_\_\_\_\_

Do you have other resources (cash on hand, another safe residence), that can prevent you from being homeless?

Do you have support, e.g., family, friends, faith community or other, that can prevent you from being homeless?

Are you fleeing or attempting to flee Domestic Violence/Abuse?  
Do you feel unsafe at your current location?  
If yes, may we contact <Local DV/SV Service Provider> about your situation?

Where did you stay last night (be specific): \_\_\_\_\_ How long at this location? \_\_\_\_\_

Check all that apply to your situation last night:

|  |
|--|
| <input type="checkbox"/> Emergency Shelter   |
| <input type="checkbox"/> Place not meant for habitation (cars, parks, abandoned buildings, camps, streets)   |
| <input type="checkbox"/> Renting a house /apartment (check all that apply)   |
| <input type="checkbox"/> facing eviction – DATE (if known): _____ <input type="checkbox"/> moved 2 or more times in past 60 days<br><input type="checkbox"/> in subsidized housing or have subsidy (VRS, FUP, Sect 8, 5+C) <input type="checkbox"/> unsafe situation<br><input type="checkbox"/> overcrowded (more than 1.5 people/room) |
| <input type="checkbox"/> Staying with friends or family because of economic hardship (check all that apply)  |
| <input type="checkbox"/> facing eviction – DATE (if known): _____ <input type="checkbox"/> moved 2 or more times in past 60 days<br><input type="checkbox"/> overcrowded (more than 1.5 people/room) <input type="checkbox"/> unsafe situation   |
| <input type="checkbox"/> Hospital, Residential Treatment, Correctional Facility or other institution   |
| <input type="checkbox"/> Stayed less than 90 days <input type="checkbox"/> Just prior, was in shelter or someplace not meant for human habitation  |
| <input type="checkbox"/> Motel/Hotel   |
| <input type="checkbox"/> Paid by someone else: _____ <input type="checkbox"/> Paid by self, not able to continue   |
| <input type="checkbox"/> None of the above    (not eligible for services, but we can refer you to some other possible options)   |
| <input type="checkbox"/> In a home owned by the individual/family    Can we refer you to the homeownership center?   |

Other notes about the situation:

I certify that the information above and any other information I have provided in applying for assistance is true, accurate, and complete.

Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Staff Certification (Check one):

- I made reasonable attempts to contact a third-party to verify housing status, but could not obtain verification.  
Attempts: \_\_\_\_\_
- I was able to verify housing status with a third-party. Notes (or attachments): \_\_\_\_\_

Staff Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **Documenting Staff's Eligibility Determination**

- Written Statement – must be Signed and Dated
- Statement must attest to the Applicant's Eligibility **or** Ineligibility
- If Ineligible – must have a record of the reason why

**HOMELESS STATUS**  
(Sample Document)

To be completed by staff.

This form records which criteria an applicant meets, but does not serve as the required documentation.

Applicant Name: \_\_\_\_\_

**CATEGORY 1**

**Check only one: An individual or family who lacks a fixed, regular, and adequate nighttime residence as follows:**

- Primary nighttime residence is a public or private place not meant for human habitation;
- Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels/motels paid for by charitable organizations or by federal, state, and local government programs);
- Exiting an institution where having resided for 90 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

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**CATEGORY 2**

**Individual or family at imminent risk of losing primary nighttime residence homelessness and have all of the following circumstances:**

- Residence will be lost within 14 days of the date of this notice; and
- No subsequent residence has been identified; and
- Lacks resources or support networks needed to obtain permanent housing

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**CATEGORY 3**

**An unaccompanied youth under 25 years of age, or a family with children and youth, who do not otherwise qualify as homeless, but am meet all of the following circumstances:**

- Defined as homeless under another federal statute;
- Has not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to this application for assistance;
- Has experienced persistent instability as measured by two moves or more during the preceding 60 days; and
- Expected to continue in such status for an extended period of time due to special needs or barriers defined as follows:  
\_\_\_\_\_  
\_\_\_\_\_

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**CATEGORY 4**

- Individual or family that is:
  - Fleeing, or attempting to flee, domestic violence;
  - Have no other residence; and
  - Lack the resources or support networks to obtain other permanent housing

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This form does not provide the required documentation for eligibility which must include: Third-party verification, Staff Certification or Observation, or Self-Certification.

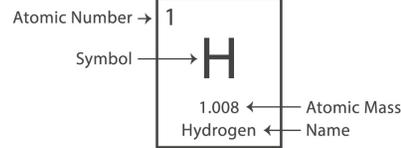
## Reminder:

A lack of 3<sup>rd</sup> party documentation **must never** prevent someone from entering shelter. This includes DV shelters.

# HUD Lead Paint Regulations

# PERIODIC TABLE OF THE ELEMENTS

|                                     |                                   |                                   |                                    |                                   |                                       |                                    |                                 |                                  |                                  |                                  |                                  |                                   |                                  |                                  |                                  |                                  |                                  |                                     |                               |                                       |                            |                                    |                             |
|-------------------------------------|-----------------------------------|-----------------------------------|------------------------------------|-----------------------------------|---------------------------------------|------------------------------------|---------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|-----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|-------------------------------------|-------------------------------|---------------------------------------|----------------------------|------------------------------------|-----------------------------|
| 1<br>H<br>1.008<br>Hydrogen         |                                   |                                   |                                    |                                   |                                       |                                    |                                 |                                  |                                  |                                  |                                  |                                   |                                  |                                  |                                  |                                  | 2<br>He<br>4.002602<br>Helium    |                                     |                               |                                       |                            |                                    |                             |
| 3<br>Li<br>6.94<br>Lithium          | 4<br>Be<br>9.0121831<br>Beryllium |                                   |                                    |                                   |                                       |                                    |                                 |                                  |                                  |                                  |                                  |                                   |                                  |                                  |                                  |                                  |                                  | 5<br>B<br>10.81<br>Boron            | 6<br>C<br>12.011<br>Carbon    | 7<br>N<br>14.007<br>Nitrogen          | 8<br>O<br>15.999<br>Oxygen | 9<br>F<br>18.998403163<br>Fluorine | 10<br>Ne<br>20.1797<br>Neon |
| 11<br>Na<br>22.98976928<br>Sodium   | 12<br>Mg<br>24.305<br>Magnesium   |                                   |                                    |                                   |                                       |                                    |                                 |                                  |                                  |                                  |                                  |                                   |                                  |                                  |                                  |                                  |                                  | 13<br>Al<br>26.9815385<br>Aluminium | 14<br>Si<br>28.085<br>Silicon | 15<br>P<br>30.973761998<br>Phosphorus | 16<br>S<br>32.06<br>Sulfur | 17<br>Cl<br>35.45<br>Chlorine      | 18<br>Ar<br>39.948<br>Argon |
| 19<br>K<br>39.0983<br>Potassium     | 20<br>Ca<br>40.078<br>Calcium     | 21<br>Sc<br>44.955908<br>Scandium | 22<br>Ti<br>47.867<br>Titanium     | 23<br>V<br>50.9415<br>Vanadium    | 24<br>Cr<br>51.9961<br>Chromium       | 25<br>Mn<br>54.938044<br>Manganese | 26<br>Fe<br>55.845<br>Iron      | 27<br>Co<br>58.933194<br>Cobalt  | 28<br>Ni<br>58.6934<br>Nickel    | 29<br>Cu<br>63.546<br>Copper     | 30<br>Zn<br>65.38<br>Zinc        | 31<br>Ga<br>69.723<br>Gallium     | 32<br>Ge<br>72.630<br>Germanium  | 33<br>As<br>74.921595<br>Arsenic | 34<br>Se<br>78.971<br>Selenium   | 35<br>Br<br>79.904<br>Bromine    | 36<br>Kr<br>83.798<br>Krypton    |                                     |                               |                                       |                            |                                    |                             |
| 37<br>Rb<br>85.4678<br>Rubidium     | 38<br>Sr<br>87.62<br>Strontium    | 39<br>Y<br>88.90584<br>Yttrium    | 40<br>Zr<br>91.224<br>Zirconium    | 41<br>Nb<br>92.90637<br>Niobium   | 42<br>Mo<br>95.95<br>Molybdenum       | 43<br>Tc<br>98<br>Technetium       | 44<br>Ru<br>101.07<br>Ruthenium | 45<br>Rh<br>102.90550<br>Rhodium | 46<br>Pd<br>106.42<br>Palladium  | 47<br>Ag<br>107.8682<br>Silver   | 48<br>Cd<br>112.414<br>Cadmium   | 49<br>In<br>114.818<br>Indium     | 50<br>Sn<br>118.710<br>Tin       | 51<br>Sb<br>121.760<br>Antimony  | 52<br>Te<br>127.60<br>Tellurium  | 53<br>I<br>126.90447<br>Iodine   | 54<br>Xe<br>131.293<br>Xenon     |                                     |                               |                                       |                            |                                    |                             |
| 55<br>Cs<br>132.90545196<br>Caesium | 56<br>Ba<br>137.327<br>Barium     | 57/71<br>Lanthanide Series        | 72<br>Hf<br>178.49<br>Hafnium      | 73<br>Ta<br>180.94788<br>Tantalum | 74<br>W<br>183.84<br>Tungsten         | 75<br>Re<br>186.207<br>Rhenium     | 76<br>Os<br>190.23<br>Osmium    | 77<br>Ir<br>192.217<br>Iridium   | 78<br>Pt<br>195.084<br>Platinum  | 79<br>Au<br>196.966569<br>Gold   | 80<br>Hg<br>200.592<br>Mercury   | 81<br>Tl<br>204.38<br>Thallium    | 82<br>Pb<br>207.2<br>Lead        | 83<br>Bi<br>208.98040<br>Bismuth | 84<br>Po<br>209<br>Polonium      | 85<br>At<br>210<br>Astatine      | 86<br>Rn<br>222<br>Radon         |                                     |                               |                                       |                            |                                    |                             |
| 87<br>Fr<br>223<br>Francium         | 88<br>Ra<br>226<br>Radium         | 89/103<br>Actinide Series         | 104<br>Rf<br>267<br>Rutherfordium  | 105<br>Db<br>268<br>Dubnium       | 106<br>Sg<br>269<br>Seaborgium        | 107<br>Bh<br>270<br>Bohrium        | 108<br>Hs<br>269<br>Hassium     | 109<br>Mt<br>278<br>Meitnerium   | 110<br>Ds<br>281<br>Darmstadtium | 111<br>Rg<br>281<br>Roentgenium  | 112<br>Cn<br>285<br>Copernicium  | 113<br>Uut<br>286<br>Ununtrium    | 114<br>Fl<br>289<br>Flerovium    | 115<br>Uup<br>289<br>Ununpentium | 116<br>Lv<br>293<br>Livermorium  | 117<br>Uus<br>294<br>Ununseptium | 118<br>Uuo<br>294<br>Ununoctium  |                                     |                               |                                       |                            |                                    |                             |
| Lanthanide Series                   |                                   |                                   | 57<br>La<br>138.90547<br>Lanthanum | 58<br>Ce<br>140.116<br>Cerium     | 59<br>Pr<br>140.90766<br>Praseodymium | 60<br>Nd<br>144.242<br>Neodymium   | 61<br>Pm<br>145<br>Promethium   | 62<br>Sm<br>150.36<br>Samarium   | 63<br>Eu<br>151.964<br>Europium  | 64<br>Gd<br>157.25<br>Gadolinium | 65<br>Tb<br>158.92535<br>Terbium | 66<br>Dy<br>162.500<br>Dysprosium | 67<br>Ho<br>164.93033<br>Holmium | 68<br>Er<br>167.259<br>Erbium    | 69<br>Tm<br>168.93422<br>Thulium | 70<br>Yb<br>173.054<br>Ytterbium | 71<br>Lu<br>174.9668<br>Lutetium |                                     |                               |                                       |                            |                                    |                             |
| Actinide Series                     |                                   |                                   | 89<br>Ac<br>227<br>Actinium        | 90<br>Th<br>232.0377<br>Thorium   | 91<br>Pa<br>231.03588<br>Protactinium | 92<br>U<br>238.02891<br>Uranium    | 93<br>Np<br>237<br>Neptunium    | 94<br>Pu<br>244<br>Plutonium     | 95<br>Am<br>243<br>Americium     | 96<br>Cm<br>247<br>Curium        | 97<br>Bk<br>247<br>Berkelium     | 98<br>Cf<br>251<br>Californium    | 99<br>Es<br>252<br>Einsteinium   | 100<br>Fm<br>257<br>Fermium      | 101<br>Md<br>258<br>Mendelevium  | 102<br>No<br>259<br>Nobelium     | 103<br>Lr<br>266<br>Lawrencium   |                                     |                               |                                       |                            |                                    |                             |



Why Pb?

A close-up photograph of a periodic table entry for Lead (Pb). The entry is contained within a rectangular cell. The text inside the cell is arranged vertically: "Lead" at the top, followed by the atomic number "82", the chemical symbol "Pb" in a large, bold font, the atomic weight "207.20", and the density "1.8" at the bottom. To the left of the cell, the numbers "1", "8", and "8" are partially visible, likely representing the period and group numbers. To the right, the number "2" is partially visible, likely representing the group number.

|   |           |   |
|---|-----------|---|
| 1 | Lead      |   |
| 8 | 82        |   |
| 8 | <b>Pb</b> |   |
|   | 207.20    |   |
|   | 1.8       | 2 |



Comes from the Latin word plumbum, meaning "waterworks"

Refers back to ancient Roman times when lead water pipes were widely used.

Some believe that widespread lead poisoning contributed to the decadence and later the fall of the Roman Empire.

Selectively affected the upper class who drank wine out of lead vessels, ate food cooked in lead pots, and drank water from lead pipes.

Earliest written accounts of lead toxicity are found on Egyptian papyrus scrolls describing their use for homicidal purposes.

A first century Greek physician wrote that lead makes the mind "give way".

## Why did we add lead to paint?



It made the paint more durable.

## The health impacts of lead

- **Interferes with the development of the nervous system and internal organs.**
- **Risk greatest in children under age six.**



## Who else is affected by lead?

- **Anyone**
- **Pregnant women can pass lead on to their babies during pregnancy**



HUD regulations target *deteriorated* paint, which is defined as:

"Any **interior or exterior** paint or other coating that is **peeling, chipping, chalking or cracking**, or otherwise damaged or separated from the substrate."



## From HUD Visual Assessment Training:

*“When performing a visual assessment, if the size is larger than a nail hole or hairline crack, you should consider the paint to be deteriorated.”*

Reminder:

- **HUD Lead Paint Regulations** apply to HUD-funded/assisted housing.
- All rental housing still needs to comply with State of Vermont **Essential Maintenance Practices**
- All renovation work in buildings must comply with **Vermont Regulations for Lead Control**

- This section only covers HUD recordkeeping requirements relative to lead paint.
- It does not cover HUD's regulations on inspections; stabilization, or clearance testing.

# HUD Lead Paint Regulations Require Five Things:

1. Provide household with a copy of a lead paint information brochure;
2. Disclose known lead hazards to the occupant (disclosure statement);
3. Conduct an **annual** Visual Assessment; (must be done by OEO or VSHA);
4. Stabilize deteriorated paint;
5. Post-stabilization clearance testing.

## Read this entire brochure to learn:

- How lead gets into the body
- About health effects of lead
- What you can do to protect your family
- Where to go for more information



# Protect Your Family From Lead in Your Home



September 2013

**Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards**

**Lead Warning Statement**

*Housing built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing, lessors must disclose the presence of known lead-based paint and/or lead-based paint hazards in the dwelling. Lessees must also receive a federally approved pamphlet on lead poisoning prevention.*

**Lessor's Disclosure**

(a) Presence of lead-based paint and/or lead-based paint hazards (check (i) or (ii) below):

(i) \_\_\_\_\_ Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

\_\_\_\_\_

(ii) \_\_\_\_\_ Lessor has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

(b) Records and reports available to the lessor (check (i) or (ii) below):

(i) \_\_\_\_\_ Lessor has provided the lessee with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below).

\_\_\_\_\_

(ii) \_\_\_\_\_ Lessor has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

**Lessee's Acknowledgment (initial)**

(c) \_\_\_\_\_ Lessee has received copies of all information listed above.

(d) \_\_\_\_\_ Lessee has received the pamphlet *Protect Your Family from Lead in Your Home*.

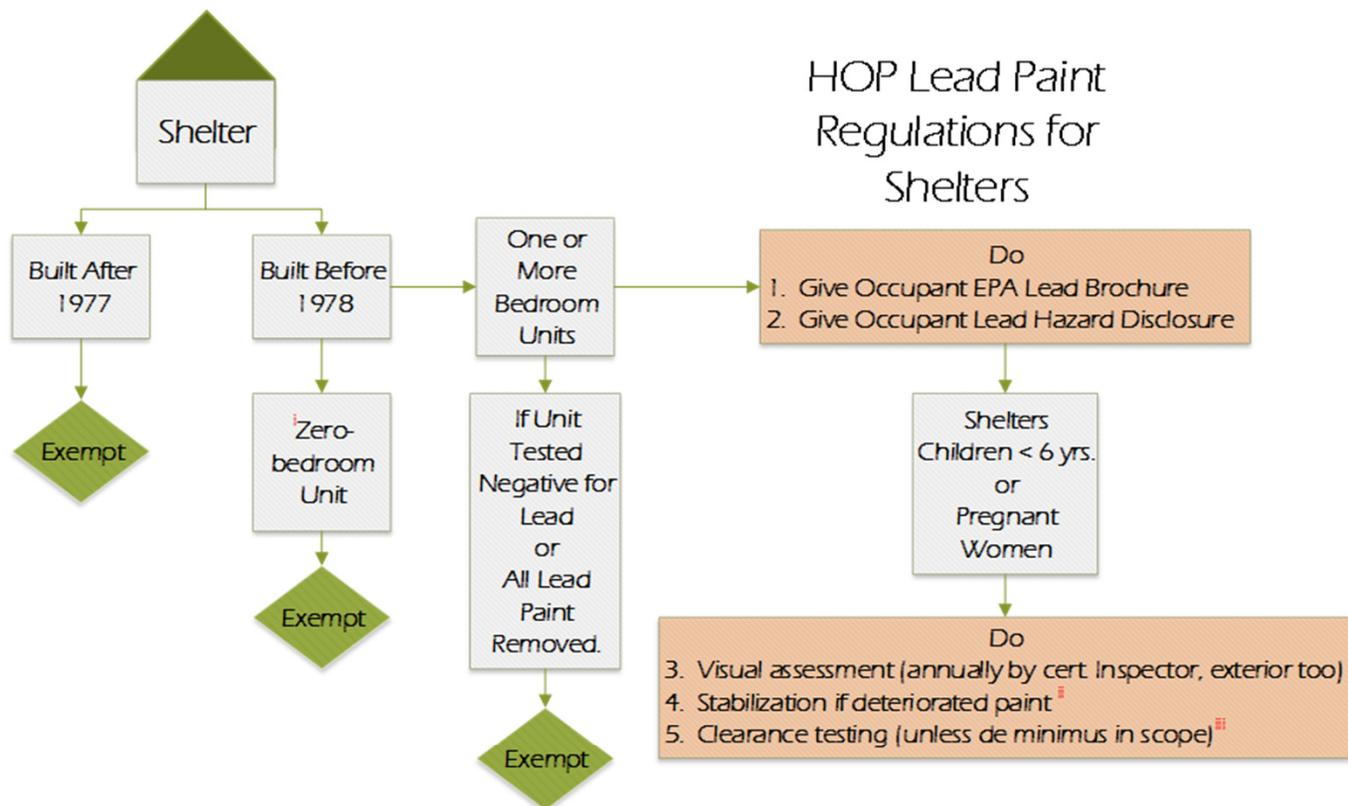
**Agent's Acknowledgment (initial)**

(e) \_\_\_\_\_ Agent has informed the lessor of the lessor's obligations under 42 U.S.C. 4852(d) and is aware of his/her responsibility to ensure compliance.

**Certification of Accuracy**

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information they have provided is true and accurate.

|        |       |        |       |
|--------|-------|--------|-------|
| _____  | _____ | _____  | _____ |
| Lessor | Date  | Lessor | Date  |
| _____  | _____ | _____  | _____ |
| Lessee | Date  | Lessee | Date  |
| _____  | _____ | _____  | _____ |
| Agent  | Date  | Agent  | Date  |



i. A zero-bedroom dwelling is defined as "any residential dwelling in which the living areas are not separated from the sleeping area" such as an efficiency or studio apartments, dorm, or single room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings."

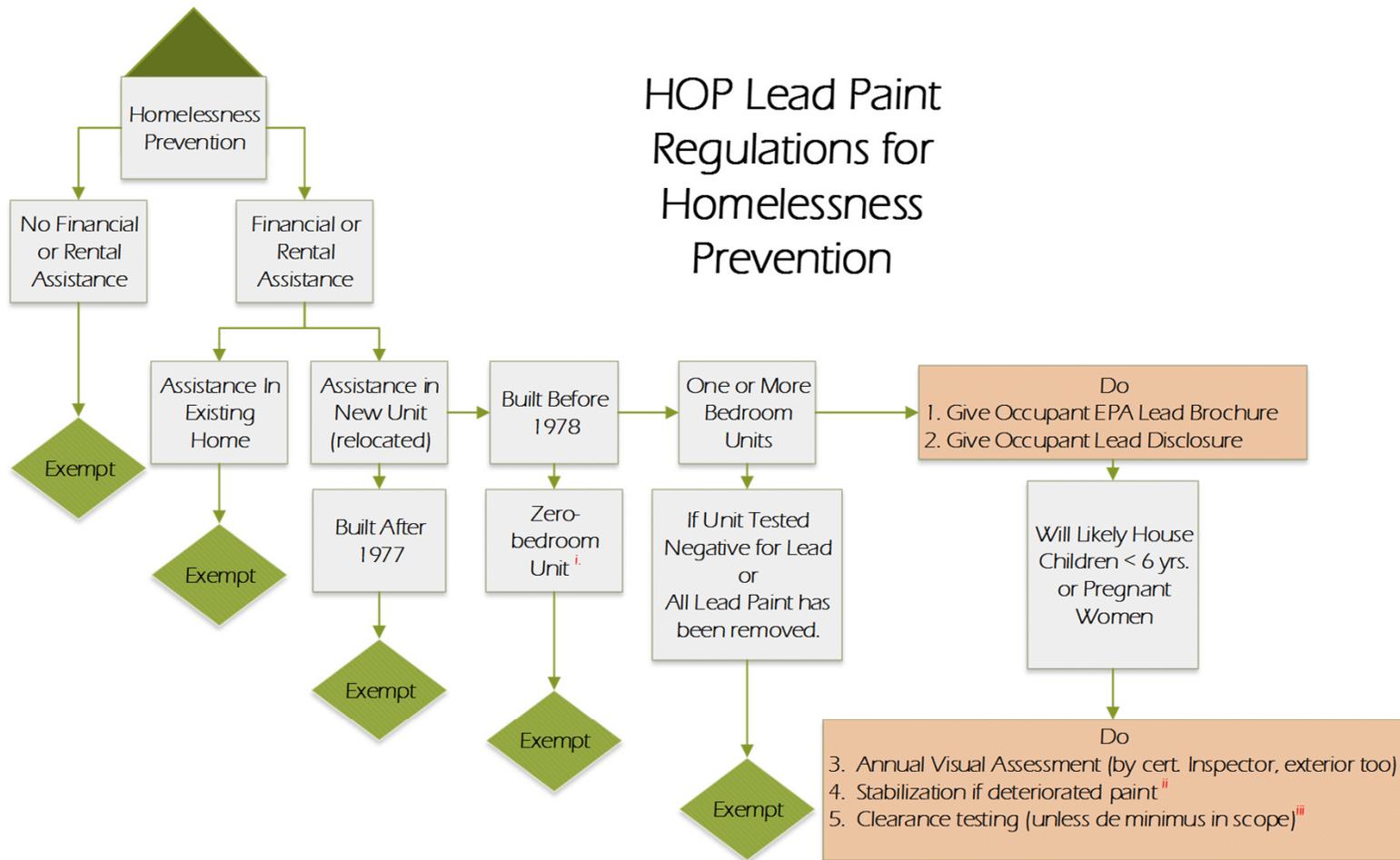
ii. Stabilization work must be done in compliance with HUD and VT Lead Paint Laws

iii. Per 24 CFR 35.1350 (d).

Brochure Link: [https://www.epa.gov/sites/production/files/2013-09/documents/lead\\_in\\_your\\_home\\_brochure\\_land\\_color\\_508.pdf](https://www.epa.gov/sites/production/files/2013-09/documents/lead_in_your_home_brochure_land_color_508.pdf)

Disclosure Link: [https://www.epa.gov/sites/production/files/documents/lesr\\_eng.pdf](https://www.epa.gov/sites/production/files/documents/lesr_eng.pdf)

# HOP Lead Paint Regulations for Homelessness Prevention



i. A zero-bedroom dwelling is defined as "any residential dwelling in which the living areas are not separated from the sleeping area" such as an efficiency or studio apartments, dorm, or single room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings."

ii. Stabilization work must be done in compliance with HUD and VT Lead Paint Laws

iii. Per 24 CFR 35.1350 (d).

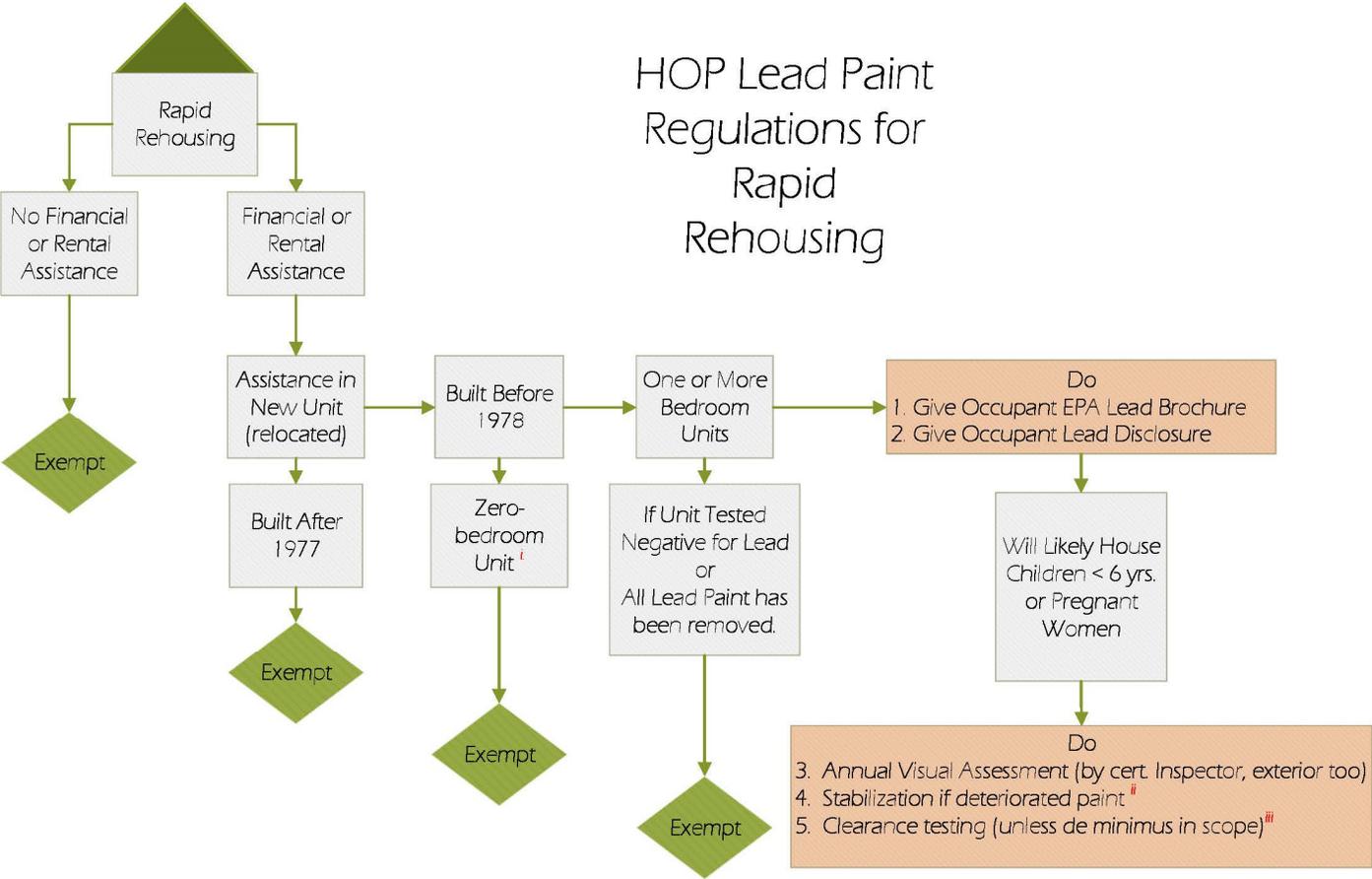
Brochure Links:

[https://www.epa.gov/sites/production/files/2013-09/documents/lead\\_in\\_your\\_home\\_brochure\\_land\\_color\\_508.pdf](https://www.epa.gov/sites/production/files/2013-09/documents/lead_in_your_home_brochure_land_color_508.pdf)

Disclosure Link:

[https://www.epa.gov/sites/production/files/documents/lesr\\_eng.pdf](https://www.epa.gov/sites/production/files/documents/lesr_eng.pdf)

# HOP Lead Paint Regulations for Rapid Rehousing



i. A zero-bedroom dwelling is defined as "any residential dwelling in which the living areas are not separated from the sleeping area" such as an efficiency or studio apartments, dorm, or single room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings."

ii. Stabilization work must be done in compliance with HUD and VT Lead Paint Laws

iii. Per 24 CFR 35.1350 (d).

Brochure Links: [https://www.epa.gov/sites/production/files/2013-09/documents/lead\\_in\\_your\\_home\\_brochure\\_land\\_color\\_508.pdf](https://www.epa.gov/sites/production/files/2013-09/documents/lead_in_your_home_brochure_land_color_508.pdf)

Disclosure Link: [https://www.epa.gov/sites/production/files/documents/lesr\\_eng.pdf](https://www.epa.gov/sites/production/files/documents/lesr_eng.pdf)

# HOP Habitability Standards

1. **Standards for Shelters: HUD's ESG Standards for Emergency Shelters**  
covers congregate, individual rooms, and emergency apartments.
2. **Standards for Permanent Housing** that is **new** to the program participant:
  - a) If Rental Assistance **less than 4 months**: HUD ESG Standards for Permanent Housing
    - OEO will inspect apartments master leased by Grantee, unless scattered site, then VSHA
    - OEO will also do Lead Paint Visual Assessment unless scattered site.
  - b) If Rental Assistance **more than 3 months**: HUD Housing Quality Standards +
    - OEO has contracted with VSHA to do this inspection.
    - VSHA will also do lead paint visual assessment.
3. **Standards for Existing Homes**: No inspections are required when assisting someone in their existing unit (habitability or lead)

## HOP – Minimum Habitability Standards for Emergency Shelter

(24 CFR part 576.403(b))

1. *Structure and Materials: The building is structurally sound and able to protect the residents from the elements and does not pose any threat to the health and safety of the residents.*
2. *Accessibility: Where applicable, the shelter is accessible in accordance with:*
  - *Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8;*
  - *The Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and*
  - *Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35.*
3. *Space and Security: Except where the shelter is intended for day use only, the shelter provides each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.*
4. *Interior air quality: Each room or space within the shelter has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents.*
5. *Water Supply: The shelter's water supply is free of contamination.*
6. *Sanitary Facilities: Each program participant in the shelter has access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.*
7. *Thermal Environment: The shelter has any necessary heating/cooling facilities in proper operating condition.*
8. *Illumination and Electricity: The shelter has adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There are sufficient electrical sources to permit the safe use of electrical appliances in the shelter.*
9. *Food Preparation: Food preparation areas, if any, contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.*
10. *Sanitary conditions: The shelter is maintained in a sanitary condition.*
11. *Fire safety:*
  - *There is at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors are located near sleeping areas.*
  - *All public areas of the shelter have at least one working smoke detector.*
  - *The fire alarm system is designed for hearing-impaired residents.*
  - *The Building has a second means of exiting in the event of fire or other emergency.*
12. *Other Grant Agreement Meets additional recipient/sub-recipient habitability standards (if any).*

## **Inspections, what issues are we seeing?**

- Smoke alarms, especially with strobes;
- A place for shelter guests to secure their belongings;
- Mold, especially in basements, some in bathrooms;
- Accessibility Issues;
- General building hazards: broken glass, dangling wires, leaking fuel;
- Deteriorated paint;
- Railings;

Fair Market Rent  
and  
Rent Reasonableness

If Rental Assistance is being provided, the rent amount must:

- Not exceed HUD's Fair Market Rent; and
- Pass the Rent Reasonableness Tests.



## FY 2019 FAIR MARKET RENT DOCUMENTATION SYSTEM

### The FY 2019 FMRs for All Bedroom Sizes

| Final FY 2019 FMRs By Unit Bedrooms |                   |                    |                    |                      |                     |
|-------------------------------------|-------------------|--------------------|--------------------|----------------------|---------------------|
| Year                                | <u>Efficiency</u> | <u>One-Bedroom</u> | <u>Two-Bedroom</u> | <u>Three-Bedroom</u> | <u>Four-Bedroom</u> |
| FY 2019 FMR                         | \$780             | \$785              | \$1,036            | \$1,298              | \$1,577             |
| <a href="#">FY 2018 FMR</a>         | \$803             | \$808              | \$1,064            | \$1,338              | \$1,608             |

Barre city is part of Washington County, VT, which consists of the following towns: Barre city, VT; Barre town, VT; Berlin town, VT; Cabot town, VT; Calais town, VT; Duxbury town, VT; East Montpelier town, VT; Fayston town, VT; Marshfield town, VT; Middlesex town, VT; Montpelier city, VT; Moretown town, VT; Northfield town, VT; Plainfield town, VT; Roxbury town, VT; Waitsfield town, VT; Warren town, VT; Waterbury town, VT; Woodbury town, VT; and Worcester town, VT. All information here applies to the entirety of Washington County, VT.

**Allowances for Tenant-Furnished Utilities and Other Services**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0169  
(exp. 04/30/2019)

See Public Reporting Statement and Instructions on back

| Vermont State Housing Authority   |                           | Multi Family |      |                    |                |      | 12/1/2017 |
|---|---------------------------|--------------|------|--------------------|----------------|------|-----------|
| Utility or Service  | Monthly Dollar Allowances |              |      |                    |                |      |           |
|   | 0 BR                      | 1 BR         | 2 BR | 3 BR               | 4 BR           | 5 BR |           |
| Heating   | a. Natural Gas            | 42           | 56   | 70                 | 83             | 97   | 97        |
|   | b. Bottle Gas             | 25           | 57   | 88                 | 120            | 151  | 151       |
|   | c. Electric               | 68           | 75   | 82                 | 89             | 97   | 97        |
|   | d. Oil                    | 61           | 92   | 123                | 153            | 184  | 184       |
| Cooking   | a. Natural Gas            | 2            | 3    | 3                  | 4              | 4    | 4         |
|   | b. Bottle Gas             | 4            | 5    | 6                  | 6              | 7    | 7         |
|   | c. Electric               | 6            | 8    | 9                  | 10             | 11   | 11        |
| Other Electric  | 8                         | 23           | 39   | 54                 | 69             | 69   |           |
| Air Conditioning  |                           |              |      |                    |                |      |           |
| Water Heating   | a. Natural Gas            | 9            | 15   | 21                 | 26             | 32   | 32        |
|   | b. Bottle Gas             | 15           | 25   | 35                 | 45             | 55   | 55        |
|   | c. Electric               | 8            | 23   | 39                 | 54             | 63   | 63        |
|   | d. Oil                    | 16           | 29   | 42                 | 55             | 68   | 68        |
| Water   |                           |              |      |                    |                |      |           |
| Sewer   |                           |              |      |                    |                |      |           |
| Trash Collection-pick up  | 35                        | 35           | 35   | 35                 | 35             | 35   |           |
| Trash Collection-drop off   | 9                         | 9            | 18   | 18                 | 18             | 18   |           |
| Range/Microwave   |                           |              |      |                    |                |      |           |
| Refrigerator  |                           |              |      |                    |                |      |           |
| Other -- specify  |                           |              |      |                    |                |      |           |
| Actual Family Allowances To be used by the family to compute allowance.<br>Complete below for the actual unit rented. |                           |              |      | Utility or Service | per month cost |      |           |
| Name of Family  |                           |              |      | Heating            | \$             |      |           |
|   |                           |              |      | Cooking            |                |      |           |
| Address of Unit   |                           |              |      | Other Electric     |                |      |           |
|   |                           |              |      | Air Conditioning   |                |      |           |
| Number of Bedrooms  |                           |              |      | Water Heating      |                |      |           |
|   |                           |              |      | Water              |                |      |           |
|   |                           |              |      | Sewer              |                |      |           |
|   |                           |              |      | Trash Collection   |                |      |           |
|   |                           |              |      | Range/Microwave    |                |      |           |
|   |                           |              |      | Refrigerator       |                |      |           |
|   |                           |              |      | Other              |                |      |           |
|   |                           |              |      | Total              | \$             |      |           |

|                        |               |
|------------------------|---------------|
| FMR Payment Standard = | <b>\$ 632</b> |
|------------------------|---------------|

|  |   |               |  |
|--|---|---------------|--|
| <b>A<br/>P<br/>A<br/>R<br/>T<br/>M<br/>E<br/>N<br/>T</b> | <b>Actual Rent</b>  | = \$ 500      | List Utilities <b>Not</b> Included In Rent Here                                      |
|  | <b>Utilities</b><br><i>(get from HUD allowance sheet)</i> | = \$ 72       | Oil heat   |
|  |   | = \$ 14       | Electric hot water   |
|  |   | = \$ 4        | Electric cooking   |
|  |   | = \$ 18       | Electric lights  |
|  | <b>TOTAL</b>  | <b>\$ 608</b> | (this apartment is eligible since the total is less than the \$632 Payment Standard) |

FY 2018 - HOP Consolidated Program Guidance Fair Market Rent & Rent Reasonableness  
**RENT REASONABLENESS and FAIR MARKET RENT CERTIFICATION**  
 (optional form)

|                           | Proposed Unit | Unit #1 | Unit #2 | Unit #3 |
|---------------------------|---------------|---------|---------|---------|
| Address                   |               |         |         |         |
| Number of Bedrooms        |               |         |         |         |
| Square Feet               |               |         |         |         |
| Type of Unit/Construction |               |         |         |         |
| Housing Condition         |               |         |         |         |
| Location/Accessibility    |               |         |         |         |
| Amenities                 |               |         |         |         |
| Unit:                     |               |         |         |         |
| Site:                     |               |         |         |         |
| Neighborhood:             |               |         |         |         |
| Age in Years              |               |         |         |         |
| Utilities (type)          |               |         |         |         |
| Unit Rent                 |               |         |         |         |
| Utility Allowance         |               |         |         |         |
| Gross Rent                |               |         |         |         |
| Handicap Accessible?      |               |         |         |         |

**CERTIFICATION:**

**A. Fair Market Rent Compliance Certification**

\_\_\_\_\_ + \_\_\_\_\_ = \_\_\_\_\_  
 Proposed Contract Rent + Utility Allowance = Proposed Gross Rent

The Proposed rent  does,  does not, exceed HUD's Fair Market Rent of \$ \_\_\_\_\_

**B. Rent Reasonableness Compliance Certification**

The comparable rents above demonstrate that the proposed rent  is,  is not, reasonable.

Date: \_\_\_\_\_ Name: \_\_\_\_\_ Signature: \_\_\_\_\_