

Massachusetts Balance of State CoC (MA-516) Rapid Re-housing Written Standards

**Commonwealth of Massachusetts
Executive Office of Housing and Livable Communities
Division of Housing Stabilization**

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INTRODUCTION

EOHLC, the ESG recipient for the Commonwealth of Massachusetts and collaborative applicant for the Massachusetts Balance of State CoC (MA-516), has developed the following written standards, which are applicable to all Rapid Re-Housing projects that receive Continuum of Care (CoC), Emergency Solutions Grant (ESG), or Youth Homelessness Demonstration Program (YHDP) funds and operate within the MA BoS CoC.

This document is meant to work in tandem with the Written Standards and Policies and Procedures for ESG and CoC Funded Programs ([most up to date version can be found under Additional Resources section here](#)) and the [BoS CoC Coordinated Entry Policies and Procedures](#).

As a complement to those documents, these written standards will spell out ways in which RRH functions specifically in the Balance of State CoC. These could be ways in which the BoS CoC has decided to specify, further detail, or make narrower RRH guidance that is provided by HUD. This document will focus on addressing topics not already clarified in the two policy and procedure documents listed above.

For RRH policies not specific to the BoS CoC, providers should defer to HUD guidance and regulation. Providers are expected to review the content of these written standards as well as the linked documentation so that they are aware of all expectations related to running a RRH project.

These written standards are intended to set basic, minimum requirements. Providers are permitted to build upon these expectations and establish more specific standards applicable to their own projects, so long as those standards are informed by equity and maintain a Housing First philosophy. Projects remain bound by the terms of the programs under which they are funded and nothing in these standards should be construed to relieve projects of this responsibility. In addition, all RRH projects must comply with the applicable Notice of Funding Availability (NOFA) under which the project was originally awarded.

Note that RRH programs are subject to differing requirements, depending upon the funding source of the program, and this document points out details of these programmatic differences.

For additional program differences between ESG, CoC, and YHDP funded RRH projects please use the following resources:

- [ESG and CoC Virtual Binders](#)
- [Rapid Re-Housing: ESG vs CoC tool provided by HUD](#)
- The [ESG](#) and [CoC](#) Interim Rules
- Along with specific ESG and/or BoS CoC RRH Policy and Procedures

PROGRAM ELIGIBILITY

Households who fit the following categories are eligible for RRH. Please refer to the HUD homeless definitions [here](#).

	Initial Evaluation			Re-Evaluation		
	ESG-RRH	CoC-RRH	YHDP-RRH	ESG-RRH	CoC-RRH	YHDP-RRH
Literally homeless (Category 1)	X	X	X			
Imminent risk of homelessness (Category 2)			X			
Homeless under other Federal statutes (Category 3)						
Fleeing/attempting to flee domestic violence (Category 4)	X*	X	X			
Income Evaluation Required				X		
Need (amount and type of assistance)	X			X		
Lacking Resources and Support Networks				X	X	X
* Eligible only if also literally homeless (Category 1)						

It is the responsibility of the provider to confirm and document eligibility for all programs prior to providing services (“Initial Evaluation” in table above). State-funded ESG projects are meant to serve individual adults experiencing homelessness. CoC projects may serve households with children as well as individuals. YHDP projects must serve youth (18-24 years of age) households. Entitlement Community funded ESG may have their own requirements.

Re-Evaluation requirements in the table speak to the annual re-evaluation HUD requires of RRH programs.

Coordinated Entry Eligibility – Because RRH projects fill vacancies with referrals through the Coordinated Entry system, households must be eligible to be added to the Coordinated Entry (CE) project in order to be considered. Please refer to the [BoS Coordinated Entry Policies and Procedures](#) to determine which households are eligible to be added to the BoS CE project.

COORDINATED ENTRY

It is required that all ESG, CoC, and YHDP-funded RRH projects within the Balance of State CoC exclusively fill their vacancies with households that are referred through the BoS Coordinated Entry system. All vacancies must be reported in VESTA by RRH providers – this is done by completing an Available Unit Form. Once reported, the appropriate Regional Navigator will begin the process of identifying an eligible household for referral.

The Regional Navigator will do a preliminary check to confirm the household is interested in moving forward with the program. They will also collect documentation that shows the household is likely eligible. Once a RRH provider receives a referral, it is ultimately the provider's responsibility to 1) make sure the household knows the details of the program and wants to enroll, and 2) confirm eligibility, including approving and retaining eligibility documentation in the household's client file.

Please refer to the [BoS CE Policies and Procedures](#) for further information on:

- CE Eligibility (including Geographic Tie requirements)
- Which households will be referred for RRH assistance
- CE Referral Process

CORE COMPONENTS OF RRH

The BoS requires all RRH providers to offer all three components of RRH listed below, depending on household need. The components are:

Housing Search

Housing placement, landlord engagement and mediation are essential parts of a successful Rapid Re-housing program. Regardless of program structure, program staff are expected to be an active partner in housing search, providing the level of support necessary to help participant households obtain housing. The process of locating housing should be supported by staff unless the program participant does not want support. Providers can determine how best to align staffing to meet local needs. Utilizing grant funds for broker fees is one way to expand services to clients without increasing staff numbers.

Program staff should discuss tenants' housing needs, location preferences, and other details upon program entry. Staff should consider tenant screening barriers, which reduce a household's ability to obtain housing because of landlord criteria and screening. Examples include poor credit, history of evictions, household size, and criminal history. Housing retention barriers, which reduce a household's ability to retain housing, must also be considered. Examples of retention barriers include paying rent in full and on time, caring for the unit, following lease terms, and interacting with the landlord. Housing placement staff can assist participants by educating them on landlord tenant law and strategizing how to be a responsible tenant in good standing with their landlord. Identifying needs and addressing potential barriers are the best way to ensure a successful housing placement.

In order to successfully place program participants in housing, programs are encouraged to do assertive landlord engagement. Where possible, a coordinated landlord engagement strategy across the CoC or community is encouraged to reduce duplication and increase the speed at

which program participants can be placed in housing. However, landlord engagement does not stop at placement. Services need to be responsive not only to tenants but also to address landlord concerns if they arise. Ensuring open communication and helping to mediate is essential to maintaining landlord relationships. In situations where a program participant is facing a threat of eviction, the agency should intervene to create a landlord mediation plan/stabilization plan to prevent eviction.

Households in CoC-funded RRH that is Tenant-Based Rental Assistance (TBRA) can lease up outside of the CoC geography. For state-funded ESG RRH projects, there are no location requirements on where eligible participants may lease up/move too. Participant choice should be accounted for when determining the geographic location housing search is being conducted. Additionally, projects should always ensure they are able to provide case management to households where they lease up. Projects may limit their program to a certain service area as long as it is communicated and approved by EOHLC. Entitlement Community funded ESG may have their own location requirements that should be taken into account.

Financial Assistance

Following a progressive engagement approach, RRH providers must be open to assisting eligible households with financial assistance including upfront move in costs, rental assistance for up to 24 months, security deposits, etc. Please note that all RRH projects must be open to providing the full 24 months of assistance if that is what the household needs. Program participants must pay, at minimum, 30% of the household's monthly adjusted income towards rent. If there are extenuating circumstances that make it difficult for a household to pay 30% of their income (for example household is in a job training program and temporarily not making the income they have recently made), a project can exercise discretion and make an exception for the household to pay less. If a household needs an exception to this requirement, please notify your Contract Coordinator.

The program may utilize a progressive engagement model to gradually increase rent for the purpose of preparing the household to maintain full rent upon exit from the program. Programs may pay the full amount for upfront moving costs and moving assistance. Different costs are eligible under ESG and CoC, so it is important to ensure each program is only paying costs that are allowable.

All RRH cases (with the exceptions of 1- start-up only referrals that are part of the pilot program and 2- those with subsidies like a voucher) must be offered start-up cost assistance along with a minimum of 3 months of rental assistance to begin. Every 3 months the provider and participant should meet to determine what ongoing financial assistance is needed. Progressive Engagement should be used to determine the amount of rent each RRH program participant must pay each month while enrolled. Progressive Engagement should also be used to determine the duration of assistance. Using this approach, programs are expected to provide

the least amount of financial assistance possible to achieve stable housing. As a best practice to support this structure, the CoC recommends collecting income documentation every 6 months.

RRH agencies should make participants aware at program entry that any income changes must be reported within ten business days. When an income change is reported, the agency should determine how that change affects the overall picture and if/how the household's rental assistance amount should be adjusted.

There is no limit on the number of times an eligible participant may re-enroll in RRH, however past attempts at RRH should be taken into account when determining the intensity of additional support.

Stabilization Case Management

Supportive Services are an essential element of a successful RRH program. The goal of these services is to help households stabilize, provide tenancy supports, and connect them to services to ensure long-term housing stability. As much as possible, programs should determine how to seek and integrate feedback from program participants and others with lived experience into the program model. Specifically, programs should aim to incorporate the following service elements and best practices:

- Trauma-Informed Care
- Housing First/Housing-Focused
- Client-Driven and Flexible
- Evolving Focus
- [Progressive Engagement](#)

Providers should be meeting with program participants at minimum once a month for the duration of assistance. These meetings can take place in person (office and/or home visit), out in the community, or virtually through phone calls/text/email. However, a program participant cannot be evicted or terminated from a program for not meeting with their case manager.

RRH ALLOWABLE ACTIVITIES

For specific allowable activities and costs please refer to the following comparison [document](#) created by HUD along with ESG and CoC Virtual Binders. For further information, see interim rule documents linked at beginning of this document.

RRH PROGRAMMATIC GUIDELINES

Income

It is recommended that income be reviewed at intake to evaluate a client's resources and determine the level of assistance that will be the most helpful, but this is not required. As a best practice it is recommended that income be collected every 6 months to inform program of future service needs. For ESG projects only, income must be gathered one year from enrollment and household must be under 30% AMI to continue being enrolled.

Re-evaluation Requirements

CoC Rapid Re-Housing

Each CoC-funded RRH provider of assistance must conduct an ongoing assessment of the supportive services needed by the participants enrolled in the project, the availability of such services, and the coordination of services needed to ensure long-term housing stability and must adjust, as appropriate. This assessment is recommended to be completed regularly, but at a minimum, must be done annually.

ESG Rapid Re-Housing

Each ESG-funded provider must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once annually for program participants receiving Rapid Re-housing assistance.

At a minimum, each reevaluation of eligibility must establish that the program participant does not have an annual income that exceeds 30% of median family income for the area, as determined by HUD, and that the program participant lacks the resources and support networks necessary to retain housing without ESG assistance.

When determining the annual income of an individual or family, the provider must use the standard for calculating annual income under 24 CFR 5.609. The recommended income calculator can be found [here](#).

RRH Rental Assistance Guidelines

	ESG-RRH Rental Assistance (24 CFR part 576.104)	CoC-RRH/ YHDP RRH Rental Assistance (24 CFR part 578.37(a)(1)(ii))
Housing Standards (Inspection)*	Units must pass HUD Habitability Standards	Units must meet HUD Housing Quality Standards
Fair Market Rent (FMR)	Rental assistance may cover up to the FMR for a unit	Rent reasonableness is the applicable rent standard, FMR not applicable
Rent Reasonableness	Units must comply with HUD's rent reasonableness standards	Units in a structure must comply with HUD's rent reasonableness standards

*Inspections for all HUD funded RRH projects will change to the NSPIRE in October 2025

HUD established FMR's may be found at: <http://www.huduser.org/portal/datasets/fmr.html>

Note: Exceptions to rent reasonableness and FMR for ESG include assistance with last month's rent and/or assistance with rental arrears in absence of first month's rent and short- or medium-term rental assistance.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

Rapid Re-housing Programs must participate in the Balance of State CoC's HMIS. A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

Costs for participating in the local HMIS are eligible grant expenditures if included in the project budget. Please refer to the sources below to make sure your project is in compliance with system security, training, data quality and any other required elements for participating in HMIS:

- HMIS section of the Written Standards and Policies Procedures for ESG and CoC Funded Programs
- [Balance of State CoC's Privacy Plan, Data Quality Management Plan, CoC HMIS Security Plan, and HMIS Governance Charter \(Zendesk link embedded\)](#)

RRH AS A BRIDGE TO PSH

The BoS CoC recognizes not all households placed into Rapid Re-housing will achieve housing self-sufficiency by the end of the program timeframe. As such, the CoC has created a process for when and how households currently in RRH programs filled through the BoS Coordinated Entry system can be considered for openings in Permanent Supportive Housing (PSH)

programs filled through the BoS CE system. Please refer to the [Coordinated Entry Policies and Procedures](#) for details.

ENROLLING A PARTICIPANT

RRH projects must enroll households in their HMIS project once the household is able to access services through the project (which includes housing search). Projects must not wait until a household is housed to enroll them. “Per Section 3.10 Project Start Date” of the HUD HMIS Data Standards Manual:

“To be admitted indicates the following factors have been met:

1. Information provided by the client or from the referral indicates they meet the criteria for admission;
2. The client has indicated they want to be housed in this project; and
3. The client is able to access services and housing through the project. The expectation is the project has a housing opening (on-site, site-based, or scattered-site subsidy) or expects to have one in a reasonably short amount of time.”

ADDENDUM 1: START UP COST ONLY CASES

The Balance of State CoC is implementing a pilot initiative where CoC and ESG RRH projects are allowed to provide start-up cost assistance alone, if that is all that the household needs and already has a unit identified. These households are only eligible for upfront move-in costs and one month of light-touch case management. They are not eligible for any ongoing rental assistance. All of these households must be exited from the RRH project one month after move-in date.

Eligible startup costs are first month’s rent, last month’s rent, security deposit, moving costs, and broker’s fee. Case managers should look to RAFT and other larger start-up cost assistance projects first to see if they are an option. Because there are EOHHS funds available for youth start-up costs, youth-specific RRH projects will not be a part of this pilot.

CE Policies and Procedures outline the process for how households are selected and prioritized for start-up cost only assistance.

This pilot initiative will run through August 31, 2025, at which point it will be assessed and decided if it should continue on a permanent basis.