



TACOMA HOUSING AUTHORITY

To: Interested Persons
From: Amy Van
Date: August 11, 2017
Re: Interim Elementary School Housing Assistance Program (ESHAP) Changes

The Tacoma Housing Authority (THA) is considering program changes to the Elementary School Housing Assistance Project (ESHAP). It seeks public comment to help it decide what to do or how to do it.

The changes concern the Elementary School Housing Assistance Program, a program that THA operates in partnership with the Tacoma Public Schools (TPS). This program provides rental assistance and supportive services to homeless families or families facing imminent threat of homelessness who have children enrolled at a Tacoma School District public school. To read more about this program, go to www.tacomahousing.org.

Under its current rules, the program is accessible to participants within the time-limits of the program, and as long as participants meet program eligibility. THA is proposing several changes to elements of the program that concern eligibility, definition of homelessness, and general program access and procedures. The details of the proposed changes show below.

This would be an interim change that will apply to the households in the program during the 2017-2018 school year. THA will be conducting a thorough evaluation and redesign of the ESHAP for expansion in the following 2018-2019 school year to other elementary schools in Tacoma with ruinous student transient rates because of homelessness or housing instability. That evaluation and redesign will be another chance to review this and other parts of the program.

THA warmly invites comments and advice about this interim proposal from anyone. THA particularly welcomes the views of program participants, former program participants, those on the waiting list, participating and prospective landlords, advocates, and social service providers. Any person may submit comments as follows:

**The 30-day comment period begins on
August 11, 2017 (8:00 a.m.)
and ends
September 11, 2017 (5:00 p.m.)**

You can mail, email, or call in comments and questions to the contact information listed below:

Tacoma Housing Authority
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1. SUMMARY OF INTERIM PROPOSAL

Tacoma Housing Authority's Elementary School Housing Assistance Program (ESHAP) is currently within its sixth year of operation at McCarver Elementary. On the strength of five years of data and experience, THA and TPS have agreed to make the program a permanent offering at the school and to expand the program to other schools within the district in 2018. The expansion will be a chance to further evaluate the program and redesign it to account for what we learned from the initial five years. During this interim period, THA convened program staff and partners to form an Interim Changes Committee to develop interim-adjustments to the program for the 2017-2018 school year until the full evaluation and redesign process is completed for program expansion in the fall of 2018.

THA proposes the following interim revisions:

1.1. Household income eligibility maximum will change from 30% area median income (AMI) to no greater than 50% AMI. This will allow more families to participate in the program;

1.2. ESHAP will expand its eligibility to include not only homeless households, but also households who are at imminent risk of homelessness as evidenced by both a rent burden by 75% or higher AND the receipt of at least three 3-day pay rent or vacate termination notices within the last 12 months. In previous years, eligible families must be already homeless as defined by the McKinney-Vento Act, this amendment will allow families who face the imminent risk of homelessness to participate in the program;

1.3. Households with children in Head Start at McCarver will be eligible to apply for the program as space allows. In previous years, families with children enrolled only in McCarver's K-5 grades were program eligible; this change will allow families enrolled in McCarver's Head Start program to enroll in ESHAP;

1.4. Households may join ESHAP once. Households that leave the program, either voluntarily or involuntarily, may not reapply in the future;

1.5. ESHAP will accept applications for the 2017-2018 schoolyear beginning in September 2017 through June 2018 as program space allows. THA proposes to provide clarification for families seeking to participate in the program, the application period was previously undefined;

1.6. In addition to supporting families through the lease-up process, ESHAP caseworkers will provide families information and instructions on positive tenancy practices as part of the program orientation process;

1.7. ESHAP caseworkers and THA's Landlord Liaison will be authorized to offer landlords the following incentives in the following order as necessary and

effective to prevail on a landlord to rent to ESHAP families: (i) explain the program and its worth to entice landlords who may participate as a community contribution; (ii) explain the close case support that ESHAP families will receive; (iii) offer expedited unit inspections; (iv) offer payment of the security deposit, up to the payment standard. This expansion of authority will equip ESHAP staff with effective tactics to support families with the lease-up process and provide staff procedural clarification that was previously not defined;

1.8. THA will provide a preference for admission to McCarver families for occupancy at THA owned property on the Hilltop. THA will ask other nonprofit housing organizations on the Hilltop to do the same;

1.9. Program forms have been updated with appropriate name changes from what was previously the “McCarver Special Housing Assistance Program” to “ESHAP”, as well as updates to form formatting.

2. PROPOSED PROGRAM CHANGES

ESHAP provides rental assistance and supportive services to homeless households who have children enrolled at McCarver Elementary School. The assistance lasts for five years or until the children leave McCarver, whichever occurs first. The supportive services help to stabilize these families and help them become more self-sufficient so they are better prepared for the unsubsidized rental market. The school district refers families to THA for enrollment in the program.

In the 2016-2017 school year, the school district’s referral of families to the program declined. Several reasons probably explain this decline. Homeless families were not self-identifying as homeless and thus not enrolling in the district’s McKinney-Vento services. Homeless families are hard to reach because they move a lot. Also, the program’s rental assistance was getting harder to use because rents in the McCarver area have been rising steeply and the rental market has gotten much tighter. For this reason, THA proposes program changes to serve the following purposes:

- make it easier for McCarver families in crisis to enroll in the program;
- make it easier for program families to find housing using the rental assistance;

2.1 Expand Income Eligibility

Under the present program, households are eligible to apply for the program if the household income is no greater than 30% of the HUD-published Pierce County median income at the time of enrollment.¹

¹ 2016 McCarver Program Manual: Section 2.1.5

To reach a broader population of families at McCarver who may be struggling with housing stability, THA proposes to expand program eligibility to households whose income is no greater than 50% AMI.

2.2 Expand Definition Beyond Homelessness to Include Imminent Risk of Homelessness

Under the present eligibility requirements of the program, the program defines homelessness by using the McKinney-Vento Definition² which states the following:

The McKinney Vento Act defines homeless children as “individuals who lack a fixed, regular, and adequate nighttime residence.”

The act provides examples of children who would fall under this definition:

- (a) Children and youth sharing housing due to loss of housing, economic hardship or a similar reason;*
- (b) Children and youth living in motels, hotels, trailer parks, or camp grounds due to a lack of alternative accommodations;*
- (c) Children and youth living in emergency or transitional shelters*
- (d) Children and youth abandoned in hospitals*
- (e) Children and youth awaiting foster care placement*
- (f) Children and youth whose primary nighttime residence is not ordinarily used as a regular sleeping accommodation (e.g. park benches, etc.)*
- (g) Children and youth living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations*
- (h) Migratory children and youth living in any of the above situations.*

THA proposes to expand eligibility to also include families who face an imminent risk of homelessness. To define this risk THA proposes to use a measure of extreme rent burden and repeated threats of eviction because of non-payment of rent. Families will be eligible for the program if they meet **both** of the following requirements:

- paying 75% or more of their income in rent and utilities;

² 2016 McCarver Program Manual: Section 2.1.1

- have received at least three 3-day notices to pay rent or vacate their apartments within the previous twelve (12) months..

This expanded definition seeks to identify those families at an imminent risk of homelessness. The U.S. Housing and Urban Development Department defines shelter burdened households as those spending over 30% of gross income on rent and utilities. Extremely shelter burdened households are those spending over 50%. Yet most of these families do not become homeless. An even more pronounced rent burden of 75%, coupled with a history of non-payment of rent notices may be more predictive of homelessness.

2.3 Head Start Families

Tacoma Public Schools offers six preschool programs throughout the district. McCarver Elementary School houses one of these programs. It is a Head Start program for children 3-years of age or older.³ Families with children in this Head Start program do not necessarily continue at McCarver kindergarten. They have the opportunity to do so if they live within the McCarver catchment area. Children who live elsewhere may enroll in McCarver kindergarten only as space permits.

The Interim Changes Committee recognized the need for ESHAP services to reach these Head Start families who face homelessness, and allow those who later enroll their child into McCarver kindergarten to remain in the ESHAP program and receive uninterrupted services. Accordingly, THA proposes:

- The present Head Start families will remain in the program if McCarver admits them to kindergarten;
- THA will admit further Head Start families as Priority 3 applicants only as space allows after Priority 1 (K-2 grade) and Priority 2 (3 – 5 grade);
- If any family admitted to the program does not get into McCarver kindergarten, THA will terminate their assistance at the end of their McCarver enrollment or the expiration of 12 months of rental assistance, whichever happens latter

2.4 Family Re-Enrollment Restriction

ESHAP families leave the program in one of three ways: (i) they reach the end of their 5 year time limit on the program. In these cases, the program provides 12 months notice and then 60 days notice of the approaching end of the assistance along with continued offers of assistance to prepare for life after the assistance ends; (ii) their children leave McCarver because they graduate to middle school or their parents move them to another

³ <https://www.tacomaschools.org/early-learning/Pages/Head-Start-2.0.aspx>

school, or (ii) THA terminated them from the program for non-compliance with the program expectations. THA proposes to make clear that program families who leave the program for any reason are not eligible to re-enroll.

This preclusion of re-enrollment helps to give other families a chance at the valuable and scarce resources that the program has to offer.

2.5 Application Submission

When THA and the school district initially designed the program, they did not define the application period. This has caused some confusion. During the interim period, THA proposes to accept applications starting September 1, 2017 through the end of the school year in June 2018, on a rolling basis as program space allows.

2.6 Help Program Families Be Good Tenants

THA recognizes the importance and benefits of being a good tenant. Although THA will not create its own formal tenant training program at this time, it will build such training into ESHAP's orientation process.

2.7 Actively Recruit Landlords With Incentives

In addition to the general support ESHAP caseworkers provide program families with the lease-up process, ESHAP caseworkers and THA's Landlord Liaison will be authorized to offer landlords incentives to rent to ESHAP households. The caseworkers and Landlord Liaison may offer the following incentives in the following order as necessary and effective to prevail on a landlord to rent to ESHAP families:

2.7.1 Caseworkers will explain the program and its worth to entice landlords who may participate as a community contribution.

2.7.2 Explain the close case support that ESHAP families will receive, including:

- Regular apartment inspections
- Case management
- Referral to services to help a family keep house

2.7.3 Offer expedited unit inspections.

2.7.4 Offer to pay an additional security deposit, up to the payment standard. Caseworkers will conduct the following prior to pursuing this option:

- Document the reasons why the landlord is requiring such enhanced payment. The reason should be particular to the family in question.

- Determine the family's capacity to contribute to deposit costs;
- Try to use alternative community assistance.

2.8 Preference for THA Hilltop Housing and Housing of Others

Hilltop rents are rising quickly. Its rental market is tightening. As a result, program families have a harder time finding housing near McCarver even using THA's rental assistance. This housing shortage for low-income families is a growing problem throughout the city.

In response, THA proposes to set a preference for McCarver program families for occupancy at THA owned properties on the Hilltop. This preference will be for tax credit financed units that are otherwise unsubsidized. The rent will be affordable to program families because these families will have the program's rental assistance. The rental assistance will remain subject to both the program's 5 year time limit and the program's requirement for parental compliance with program rules. In contrast, the regular tax credit rules will govern the duration of the tenancy. In other words, the program family may remain in their apartment even after their program participation ends as long as they can pay the rent and otherwise follow the rules.

THA will ask other nonprofit housing organizations on the Hilltop to do the same.

3. UPDATED FORMS & DOCUMENTS

The following forms and documents related to ESHAP have been updated to reflect changes recommended by the Interim Changes Committee and updated with the current name of the program and appropriate THA letterhead formats. *See:* Appendix A – Appendix M

3.1 Appendix P: End of Program 60 and 30 Day Client Exit Plan and Client Exit Checklist

3.2 Appendix Q: Exit Questionnaire

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4. PUBLIC COMMENT

The full ESHAP program manual with the proposed changes can be found on THA's website. www.tacomahousing.org.

THA warmly invites comments and advice about this interim proposal from anyone. THA particularly welcomes the views of program participants, former program participants, those on the waiting list, participating and prospective landlords, advocates, and social service providers. Any person may submit comments as follows:

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