# XIII. VETERANS AFFAIRS SUPPORTIVE HOUSING PROGRAM (VASH)

### **OVERVIEW**

The HUD-VASH Program is a collaborative effort between the US Department of Housing and Urban Development and the Department of Veterans Affairs. It's a national initiative that provides permanent housing and supportive services to veterans experiencing homelessness. The CDC will administer the HUD Veterans Affairs Supportive Housing Vouchers ("HUD-VASH") in accordance with this Administrative Plan, 24 CFR part 982, and subsequent HUD notices, guidance, or regulations that amends or supersedes Docket No. FR-5213-N-01 (located in the back of this Chapter). CDC partners with the local Veteran's Medical Clinic. The goal of the Program is to combine Housing Choice Voucher rental assistance with case management and clinical services provided by the Department of Veterans Affairs at its medical centers to enable veterans experiencing homelessness to re-integrate in the community to lead healthy, productive lives.

ADOPTED: 12.19.2024

All provisions of the Housing Choice Voucher Administrative Plan apply to HUD-VASH participants, unless otherwise specified, or exempted by regulation or by this chapter of the administrative plan.

### A. ADMISSION TO THE PROGRAM

The local Veteran's Clinic will screen veterans experiencing homelessness for eligibility for the HUD-VASH Program, in accordance with its screening criteria, except for income/asset eligibility and sex offender status. Eligible veterans who agree to participate in case management will be referred to CDC for final eligibility determination.

CDC will provide the Veteran's Clinic with a blank application which will include a CDC designated application, an Authorization for the Release of Information/Privacy Act Notice (HUD 9886), as well as a request for supporting documentation related to the family's income, assets, expenses, and family composition.

The VA social worker will provide CDC with a completed referral form, a completed application signed by the applicant, including all required supporting documentation. All initial required documents are the same as for the Housing Choice Voucher program. CDC's decision to admit the applicant will be based on the following criteria;

- The applicant is income and asset eligible for the program in accordance with 24 CFR 982.201. CDC may deny admission if the applicant does not meet the income and asset eligibility requirements.
- CDC will serve veterans up to the low-income limit (i.e., 80% area median income (AMI)).
- The CDC will screen for sex offender status and will also deny admission if the veteran is a sex-offender with a lifetime registration requirement. If another family member in the household is the lifetime registrant (not the veteran) – the family

may be eligible for the voucher if the family member subject to the registration requirement is removed from the household.

• The VA social worker will verify the applicant has complied with VA case management requirements.

No other eligibility priorities or preferences are applicable and the CDC shall not deny HUD-VASH applicants' admission for any other grounds.

Should a VASH applicant owe CDC or any other Housing Authority money from a previous tenancy or participation in a rental assistance program, CDC will inform the applicant. If the money is owed to CDC, a repayment agreement will be executed in accordance to Chapter XXIV. of this Administrative Plan. If the debt has been referred to the Ukiah Credit Bureau, the applicant will be referred to the Credit Bureau to establish a payment schedule. If monies are owed to another Housing Authority the applicant will be referred to that Authority to pay that debt.

**Specifically Excluded Income:** Income specifically excludes deferred disability benefits from the Department of Veterans Affairs that are received in a lump sum amount or in prospective monthly amounts and any expenses related to aid and attendance under section 1521 of title 38, United States Code. All other VA service-connected benefits are included in determining income eligibility for the program.

**Determining Income Eligibility (income exclusion):** In order to ensure a veteran experiencing homelessness is not excluded from participation from the HUD-VASH program because of their VA service-connected disability benefits an alternative requirement has been set forth. The CDC must determine the applicant's annual income for purposes of income eligibility by excluding all VA service-connected benefits received by the applicant in addition to any income exclusions listed in the regulation. If the applicant now qualifies as a low-income family, the VA service-connected benefits (with the exception of the normally excluded deferred VA disability payments and the aid and attendance) must still be included as annual income when calculating the family's adjusted income. In other words, the VA service-connected disability benefits are excluded for purposes of determining income eligibility but included for purposes of calculating the total tenant payment, housing assistance payment, and family share.

Asset Limitations: In determining compliance with the asset limitation at 24 CFR 5.618 at admission, for the HUD-VASH program, CDC must accept a self-certification by the family that the family's total assets are equal to or less than \$50,000 (adjusted annually for inflation), and that the family does not have any present ownership interest in real property, without taking additional steps to verify the accuracy of the declaration. The CDC also must fully verify the family's assets every three years. For net family assets exceeding \$50,000 (adjusted annually for inflation), the CDC must fully verify the family's assets as required for all HCV families.

**Social Security Cards and Photo Identification:** In regard to verifying Social Security Numbers (SSN) for the veteran experiencing homelessness and their family members,

the CDC must follow the SSN verification hierarchy. CDC must use available flexibilities in accordance with 24 CFR 5.216(g)(1)(iii) to accept self-certification of SSN and at least one third-party document, such as a bank statement, utility or cell phone bill, or benefit letter that contains the name of the individual in the absence of other documentation. For the veteran experiencing homelessness, the third-party document could be the VA-issued photo ID or document with the Veteran's name. If verifying an individual's SSN using this method, the CDC must document why the other SSN documentation was not available. In the case of the veteran experiencing homelessness, the CDC must accept the Certificate of Release or Discharge from Active Duty (DD214) or the VA-verified Application for Health Benefits (10-10EZ) as verification of SSN if these forms are available; however, these forms are not required to verify SSN. These documents must also be accepted for proof of age purposes. Please note that veterans are also issued photo identification cards by the VA and these cards must be accepted by the CDC in lieu of another type of government-issued photo identification.

# **B. ISSUANCE OF VOUCHER**

Once an applicant is determined eligible CDC will promptly contact the family and VA social worker via phone to schedule a briefing appointment. If CDC is unable to contact the family or VA Social Worker by phone to confirm, a notice of the briefing session will be mailed to the family. This notice will be sent at least *ten (10)* calendar days prior to the scheduled briefing. The notice will be sent to the VA social worker as well. During the briefing appointment the applicant will receive a HUD/VASH Voucher and a briefing packet. The briefing packet will be the same as those provided to Housing Choice Voucher (HCV) applicants in accordance with Chapter IV- of this Administrative Plan

Applicants must be given an initial 120 calendar days to seek a unit in Mendocino County. Should the household wish to exercise portability, the VA social worker must indicate this is approved by the VA on the application submitted, or on the referral form. If the family has not found housing within 60 days of the voucher issuance CDC will request the family and/or social worker to provide an updated application as well as updated income verifications.

Upon expiration of the initial 120 day term CDC may grant one final 60 day extension. Extensions are permissible primarily for these reasons;

- Extenuating circumstances such as hospitalization or a family emergency for an extended period of time, which has affected the family's ability to find a unit within the initial 120 day period. Verification is required.
- The CDC is satisfied that the family has made a reasonable effort to locate a unit, which may include seeking the assistance of the CDC, throughout the initial sixtyday period. A completed search record is required.
- The family was prevented from finding a unit due to disability accessibility requirements or large size (4 bedroom or larger) unit requirement. The Search Record is part of the required verification.

• If the vacancy rate for rental housing in the jurisdiction is less than 5 percent another extension will be granted automatically on request up to a total of 60 days.

If the term of the voucher is extended beyond the initial 120 days CDC requires the family and/or social worker to provide an updated application as well as updated income verifications at the time of the extension request.

If the term of the voucher expires the VA Social Worker may re-refer the applicant. A new application and referral form must be completed and updated supporting documentation related to the family's income, expenses, and family composition must be supplied to CDC.

### C. LANDLORD INCENTIVES AND SERVICES

This policy outlines the guidelines and processes for the CDC to administer assistance related to application fees, landlord incentives, security deposits, utility deposits, renter's insurance, and mitigation/retention funds.

Under Notice PIH 2024-10-10, CDC was awarded additional VASH administrative fees. These funds must be used exclusively to support the VASH program for the following purposes:

- Costs incurred by CDC in carrying out administrative responsibilities under the program.
- Other eligible expenses described in Section 3 of Notice PIH 2022-18-18: Use of Housing Choice Voucher and Mainstream Voucher Administrative Fees for Other Expenses to Assist Families to Lease Units.

# **Eligibility for Services:**

- Housing search assistance and services are available to VASH individuals and families actively searching for a rental unit.
- VASH individuals and families are eligible if they have not accessed this resource within the **24 months preceding the request.**

**Scope of Services:** The following services are designed to help households overcome key barriers to obtaining permanent housing. Services will be offered to eligible VASH households until funds are exhausted or no longer available.

#### 1. APPLICATION FEE ASSISTANCE

### **Eligibility and Conditions:**

 CDC may assist eligible families with application fees if required to determine suitability for a unit. • Each household is limited to a maximum of four application fees per person during their current housing search.

ADOPTED: 12.19.2024

**Payment Process:** Application fees will be paid directly to the landlord/owner or their designated entity upon verification of eligibility.

### 2. LANDLORD INCENTIVE PAYMENTS

To encourage new landlord participation, support landlords renting to VASH households, and retain current participating landlords.

# **Incentive Types:**

 Landlords may receive a \$1,000 incentive for renting a unit to an eligible household.

### **Conditions:**

- 1. Incentives are available only at the time of move-in.
- 2. A written request must be submitted by the landlord/owner to CDC within 60 days of the effective date of the Housing Assistance Payment Contract (HAPC).
- For shared housing (two roommates in one unit with separate leases), only one incentive is allowed if move-in occurs within six months of each other.
- 4. Landlords may receive a maximum of three incentives in a rolling 12-month period.

### 3. SECURITY DEPOSIT ASSISTANCE

# **Eligibility and Conditions:**

- Assistance is available once per lifetime per household.
- Security deposit assistance may not exceed the lesser of:
  - o One month's rent to the owner.
  - The state/local law maximum.
  - The amount required by the landlord.
- Payment is made directly to the owner/landlord.

**Documentation Requirements:** Written request from the family or representative, including:

- Requested amount.
- Explanation of financial need.
- Certification of lack of prior security deposit assistance.

CDC will verify program history and notify the landlord that the deposit is granted to the tenant.

ADOPTED: 12.19.2024

**California Law Compliance:** Security deposits must align with Assembly Bill No. 12, Chapter 733. Deposits for service members cannot exceed one month's rent.

### 4. UTILITY DEPOSIT & UTILITY ARREARS ASSISTANCE

# **Eligibility and Conditions:**

- Assistance is limited to \$500, which can be applied to one or multiple utility service providers.
- Payments cover deposits, connection fees, and arrears blocking service.

# **Documentation Requirements:**

- A current statement confirming:
  - Household member's name.
  - Amount owed and billing address.
  - Utility company and service detail statement.

# **Payment Process:**

- Payments are made directly to the utility company.
- Deposits returned by the utility supplier will go to the household.

# 5. LANDLORD MITIGATION/RETENTION FUNDS

To support landlords for damages, cleaning charges, or past due rent exceeding the security deposit, as well as to encourage lease renewals or tenant retention.

# **Eligibility and Conditions:**

- Maximum assistance is \$1,000 per tenant as funds are available.
- Written documentation from landlords is required, including:
  - Itemized statements of damages exceeding normal wear and tear.
  - Tenant ledgers or notices for past-due rent.

# **Timeline for Requests:**

 Landlords must request mitigation funds within 60 calendar days of rental assistance termination or tenant move-out. • CDC may review case-by-case requests between 60-179 days but will not process requests after 180 calendar days.

ADOPTED: 12.19.2024

# **Inspection and Verification:**

 CDC may inspect units before and after tenant move-out to verify damages.

#### 6. RENTER'S INSURANCE

The CDC may assist eligible families with the cost of renter's insurance premiums under specific circumstances as detailed below. This policy aims to ensure fairness and consistency while limiting the organization's liability.

# **Eligibility and Conditions for Rental Insurance Assistance:**

# A. Lease Requirement:

- Assistance will only be provided if renters insurance is a condition of the lease.
- This requirement must also apply to unassisted families residing on the premises (for multi-unit properties).

# B. Covered Costs:

- Assistance is limited to the payment of renter's insurance premiums.
- The policy does not cover deductibles or other costs associated with claims.

### C. Resident Responsibility:

- Residents are solely responsible for understanding and complying with the terms of their renter's insurance policy.
- The CDC will not be liable for any damages or losses incurred, whether insured or uninsured.

### D. Documentation Requirements:

- Written confirmation from the landlord verifying the lease requirement for renter's insurance and confirmation this requirement applies to unassisted families residing on the premises.
- A written request from the family detailing their need for assistance.

### **Payment Guidelines:**

#### A. Payment Method:

 Payments will be made in one lump sum directly to the insurance provider.

### B. Duration and Amount:

 Assistance is capped at twelve (12) months of renter's insurance premiums or \$500 whichever is less.  Assistance is only available at the time the household initially moves into the unit.

ADOPTED: 12.19.2024

#### C. Limitations:

- No monthly payments will be made by the CDC.
- After the initial twelve-month period, residents are fully responsible for all costs associated with renter's insurance, including premiums and deductibles.

**Disclaimer:** The CDC's payment of renter's insurance premiums does not imply liability for any damages or losses incurred by the resident. Residents are responsible for understanding their insurance policies and ensuring adequate coverage for their needs.

### 7. GENERAL PROVISIONS

- A. Funding Availability:
  - All assistance and incentive programs are subject to the availability of funds.
- B. Documentation and Recordkeeping:
  - Proper documentation must be submitted and retained for each request.
- C. Final Authority:
  - The Housing Programs Manager has the discretion to review and approve exceptions to standard limits, as appropriate.

### D. INITIAL LEASE TERM

Initial lease terms may be less than one year for HUD-VASH Participants.

#### E. ELIGIBLE HOUSING

In addition to private market rental units, HUD-VASH Families will be permitted to live on the grounds of a VAMC (Veterans Administration Medical Center) facility.

### F. VA RESPONSIBILITIES & CASE MANAGEMENT REQUIRMENTS

The VA medical facility responsibilities include:

- (1) The screening of veterans to determine whether they meet the HUD-VASH program participation criteria established by the VA national office;
- (2) Assisting veterans with the CDC application and assisting the veteran family with obtaining needed CDC documentation to ensure rapid voucher issuance;
- (3) Referrals of veterans experiencing homelessness to the CDC;
- (4) Providing case management and supportive services to potential HUD-VASH program participants, as needed, prior to CDC issuance of rental vouchers;
- (5) Providing housing search assistance to HUD-VASH participants with rental vouchers;

(6) Identifying the social service and medical needs of HUD-VASH participants and providing, or ensuring the provision of, regular ongoing case management, outpatient health services, hospitalization, and other supportive services, as needed, throughout this initiative; and

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(7) Maintaining records and providing information for evaluation purposes, as required by HUD and the VA.

The VA, in consultation with the veteran, is responsible for determining if case management is required and if the case management requirement is satisfied.

If a veteran no longer requires case management, but maintains their HUD-VASH voucher assistance, the VA will maintain contact with the veteran family to provide support and planning assistance with the recertification and reinspection process. The VA will remain available to provide support to the veteran family, as needed.

A HUD-VASH family's rental assistance must be terminated if the family refuses, without good cause, to participate in required case management as determined by the VAMC.

### G. ADDING HOUSEHOLD MEMBERS

When adding a family member after the HUD-VASH family is admitted to the program, the rules of 24 CFR 982.551(h)(2) apply. Other than the birth, adoption or court-awarded custody of a child, the CDC must approve additional family members and will apply our regular screening criteria in doing so.

#### H. INSPECTIONS

To expedite the leasing process for tenant-based HUD-VASH, the CDC may pre-inspect available units that veterans may be interested in leasing with a HUD-VASH voucher in order to maintain a pool of eligible units. If a HUD-VASH family selects a unit that passed a HQS inspection within 90 days of the date of the Request for Tenancy Approval, the unit may be approved as long as it meets all other conditions.

### I. PAYMENT STANDARDS

CDC may establish an exception payment standard up to 140 percent of the published FMR only to be applied if required as a reasonable accommodation in accordance with 24 CFR part 8 for a family that includes a person with a disability. Any unit approved under an exception payment standard must still meet the reasonable rent requirements.

#### J. SPECIAL HOUSING TYPES

CDC must permit HUD-VASH clients to use the following special housing types for tenantbased HUD-VASH assistance, regardless of whether these types are permitted in the administrative plan for other families:

Single Room Occupancy (SRO);

- Congregate Housing;
- Group Home;
- Shared Housing; and
- Cooperative Housing.

Regulations for these housing types can be found at 24 CFR 982 subpart M.

### K. PORTABILITY OF HUD-VASH VOUCHERS

Portability Moves Within Same Catchment Area (or area of operation) Where Case Management is Provided by the Initial PHA's Partnering VA Medical Facility: The HUD-VASH family may initially lease up, or move under portability provisions. If the Local Veterans Clinic will still be able to provide the needed case management services because of the proximity, the receiving PHA must process the move in accordance with the Portability policies of 24 CFR 982.355. However, the receiving PHA must bill the initial PHA; the receiving PHA does not have the option to absorb the HUD-VASH family under this situation.

ADOPTED: 12.19.2024

Portability Moves within the Same Catchment Area Where Both PHA'S Have Received HUD-VASH Vouchers: The receiving PHA may bill the initial PHA or absorb the family into its own HUD-VASH program if the VA medical facility providing the initial case management agrees to the absorption by the receiving PHA and the transfer of case management. The absorption will also entail the availability of a HUD-VASH voucher and case management provisions by the receiving PHA's partnering VA medical facility.

**Portability Moves Where Receiving PHA is Beyond the VA Medical Facility Catchment Area:** If a VASH family wants to move where it will not be possible for CDC's partnering local Veterans Clinic to provide case management services, the local Veteran Clinic must first determine whether the HUD-VASH family could be served by another VAMC that is participating in the program, and the receiving PHA must have a HUD/VASH voucher available for this Family. If the above conditions are met, the VASH family must be absorbed by the receiving PHA. Upon absorption, the CDC's HUD-VASH voucher will be available to lease to a new HUD-VASH eligible family referred by the partnering local Veterans Clinic.

If a family chooses to exercise its rights to portability the family must submit the request in writing to CDC. The local Veterans Clinic must provide CDC with a written recommendation supporting the participants request to move out of Mendocino County.

When the receiving PHA completes the 50058 under this scenario, the action type that must be recorded on line 2a is "1" for new admission or "4" for portability move in. Whether the family is a new admission or portability move-in, section 12 of the 50058, line 12d is always marked "yes". In cases of portability where families move out of the catchment area of the initial PHA, 12e must be 0 since the family must be absorbed, and 12f must be left blank.

Portability Moves Where Receiving PHA is Beyond Catchment Area For Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking: Veterans who request to port beyond the catchment area of the VA medical facility where they are receiving case management in order to protect the health or safety of a person who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believes themselves to be threatened with imminent harm from further violence by remaining in the dwelling unit (or any family member has been the victim of sexual assault that occurred on the premises during the 90-calendar day period preceding the family's move or request to move), may port prior to receiving approval from the receiving VA medical facility but must notify the VA medical facility at the earliest time possible to ensure appropriate supports are provided to the veteran family. The initial PHA must follow its emergency transfer plan.

Consistent with documentation requirements at 24 CFR 5.2005(e)(10), PHAs may require verbal self-certification or a written request from the participant seeking a move beyond the catchment area of the VA medical facility. A participant may provide a completed form HUD-5383 to satisfy a requirement to provide a written request.

The verbal self-certification or written request must include either;

- a. A statement expressing that the participant reasonably believes that there is a threat of imminent harm from further violence if the participant were to remain in the same dwelling unit assisted under the PHA; or
- b. In the case of a participant who is a victim of sexual assault and is seeking a transfer on the basis that the sexual assault occurred on the premises during the 90-day period preceding the participant's request for the move, a statement that says this.

The veteran escaping violence must be admitted to the VA medical facility caseload. For participants seeking a move beyond the catchment area of the VA medical facility while maintaining a HUD-VASH voucher, the participant must still port to a PHA that has a HUD-VASH program: If the receiving PHA does not have a HUD-VASH voucher available to lease, they must bill the initial PHA until a HUD-VASH voucher is available, at which point the porting veteran must be absorbed into the receiving PHAs program.

**Portability Moves When Case Management is no longer Required:** If the family no longer requires case management, as determined by the VA medical facility, there are no portability restrictions. When completing the HUD-50058, the family will continue to be coded as "VASH" on line 2n unless the family has been moved to a regular voucher, in which case the code in 2n would be left blank.

# L. TRANSFER FROM HUD-VASH TO TENANT BASED VOUCHER ASSISTANCE.

If the local Veterans Clinic determines the VASH family no longer requires case management or the Veteran will no longer reside with the family, the CDC may offer the family a regular tenant-based voucher in the tenant-based program to free up the HUD-VASH voucher for another veteran experiencing homelessness. VASH participants may

be recommended by the HUD-VASH Social Worker for graduation from HUD-VASH program. CDC may issue a Housing Choice Voucher provided ALL criteria below is met;

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- Participant has complied with rules and regulations of the HUD-VASH program for the past 12 consecutive months.
- Participant has remained housed for the past 12 consecutive months.
- Participant does not owe the CDC for any Repayment Agreements or other charges.
- Participant has not violated their lease agreement within the past 12 consecutive months

The offer of tenant-based assistance is contingent on funding availability.

The total number of HUD-VASH participants that will be offered a regular voucher will not exceed 10 participants in a 12-month period. The HUD-VASH Social worker must submit the request for the participant to graduate in writing to the CDC along with a completed initial application for the Housing Choice Voucher Program.

### M. TERMINATION OF RENTAL ASSISTANCE

Rental Assistance may be terminated if the participant violates conditions of occupancy in accordance with Chapter XIV- of this Administrative Plan. However, prior to terminating HUD/VASH participants, CDC will exercise their discretion under 24 CFR 982.552(c)(2) and consider all relevant circumstances of the specific case, including granting reasonable accommodations for persons with disabilities in accordance with 24 CFR part 8, as well as including the role of the case manager and the impact that ongoing case management services can have on mitigating the conditions that led to the potential termination. CDC also must grant reasonable accommodations for persons with disabilities in accordance with 24 CFR part 8. The CDC can not terminate assistance on the basis or as a direct result that a member of the participant family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

In addition, a HUD-VASH participant family must not be terminated after admission, for a circumstance or activity that occurred before admission and was known to the CDC but could not be considered at the time of admission due to the HUD-VASH operating requirements. The CDC can only terminate the family's assistance for program violations that occur after the family's admission to the voucher program.

The following guidelines will be used when considering each case where drug-related or criminal activity is involved.

 For drug-related offenses, the local Veterans Clinic may provide CDC with verification that the participant is actively seeking or enrolled in recovery services.
Once enrolled, the local Veterans Clinic must provide CDC with the participants progress with recovery and, as long as the participant is actively pursuing recovery (to be outlined by the rehabilitation facility), their assistance may continue uninterrupted. For those families not seeking treatment termination will occur.

ADOPTED: 12.19.2024

 For criminal activity the CDC, participant, and HUD/VASH Social Worker will work together to view the offenses on a case by case basis to determine what further action is necessary.

CDC must terminate a participant's rental assistance if the CDC has not made a payment on behalf of the participant for a period of 180 calendar days.

The regulations state the CDC must terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease. HUD is waiving this provision for HUD-VASH and establishing an alternative requirement that the CDC may terminate program assistance in these cases. Prior to termination of HUD-VASH participants, CDC will exercise our discretion under 24 CFR 982.552(c)(2) and consider all relevant circumstances of the specific case, as well as including the role of the case manager and the impact that ongoing case management services can have on mitigating the conditions that led to the potential termination, prior to determining whether to terminate assistance.

Additionally, the family must be receiving case management from the Local Veterans Clinic, unless it is determined by the clinic that the family no longer requires case management. Failure to participate in the case management portion of the program without good cause will result in termination of rental assistance by the CDC.

Applicants and participants of HUD/VASH will be afforded the same rights as regular HCV applicants and participants to appeal any negative action taken against the family by CDC.

### N. FAMILY BREAK-UPS

Generally, in the case of a family break-up, the HUD-VASH assistance must stay with the HUD-VASH veteran. However, in the case of domestic violence, dating violence, sexual assault, or stalking, in which the HUD-VASH veteran is the perpetrator, the victim must continue to be assisted. Upon termination of the perpetrator's HUD-VASH voucher due to the perpetrator's acts of domestic violence, dating violence, sexual assault, or stalking, the victim must be given a regular HCV if one is available, and the perpetrator's HUD-VASH voucher must be used to serve another eligible veteran family. If the regular HCV is not available for the victim, the perpetrator must be terminated from assistance, and the victim will continue to utilize the HUD-VASH voucher.

#### O. OTHER PROGRAM POLICIES

The minimum rent for VASH participants is set at \$0. This is intended to assist veterans experiencing homelessness who have no income in securing housing as quickly as possible. All other provisions of the minimum rent regulations for the Housing Choice Voucher Program apply; including provisions specified in this Administrative Plan regarding minimum rent.

# P. SEMAP, VMS REPORTING

HUD/VASH vouchers are administered in accordance with HUD/VASH notices. The VASH Vouchers are monitored in VMS separately from all other tenant based vouchers. HUD/VASH vouchers will not be included in the SEMAP leasing indicator denominator as they are dependent upon referrals from VAMC. The code "VASH" will be recorded in section 2n of the HUD-50058 form to indicate in PIC that the Family is a HUD-VASH Participant.

ADOPTED: 12.19.2024