

# Termination of Assistance Policy and Procedures

Sacramento County Continuum of Care

---

## Policy

Provider-initiated termination of HUD-CoC program assistance should be rare and used only as a last resort to ensure safety. Programs are expected to maintain a low-barrier, housing-first approach and only terminate assistance in the most severe cases when the participant is a threat to themselves or another person. Program termination cannot be based solely on non-compliance with property-related requirements that result in housing being jeopardized (i.e. eviction). Termination does not bar the program from providing further assistance later to the same individual or family.

Housing providers are to exhaust all other options and resources to provide services and alternative housing solutions and/or problem-solving before termination. Housing providers need to document steps demonstrating that all options have been explored, attempted, and did not resolve the reasons for termination. SSF may request to review documents in certain circumstances, like in the example of a transfer request or other instances. Transfers can be explored in rare instances, but not all transfers may be approved. If a transfer request is submitted to prevent program termination and the reasoning meets criteria, programs will notify SSF prior to terminating the participant and give time to explore transfer options.

The policy protects participants from arbitrary reasons of termination and limits the use of termination to manage programs. It is the goal of the Continuum of Care to prevent returns to homelessness.

Note: This policy does not cover participants who are enrolled in a program, but not yet housed. Programs may need to exit a participant who is not yet housed. Examples include no contact for at least 90 days, participant moves away, and participant is no longer in need of the program.

## Procedures

Due process must be given to each participant when terminating assistance which includes providing a formal process that recognizes the rights of individuals receiving assistance under the due process of law. Programs must:

- Provide the participant with a written copy of any participant responsibilities and the termination process (including number of business days that each process step will take) before the participant begins to receive assistance
- Review the policy and possible termination causes verbally with participants upon entry
- Provide written notice to the participant containing a clear statement of termination reasons
- Offer a review of any termination decisions, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision
- Provide written notice of the final decision to the participant

## **Documentation**

Documentation should be stored in the participant's file, and include the following:

- Signed acknowledgement of receipt of the termination policy and verbal review
- Written documentation of termination reasons (signed by participant when possible)
- Copy of any written objections (or a notation in the file of any verbal objections) made by the participant, and any action taken by staff
- Signed acknowledgement of receipt of the final decision made by program staff of any further objection made by participant (or a copy of the notice when a signature isn't possible) – encourage upload to HMIS, if in the event there are objections/transfer requests/
- Documented steps showing staff's due diligence of explored options, attempts at resolution and reasons for lack of resolution

Termination documents may be requested during monitoring or if SSF needs to further investigate client concerns or complaints.