

Guidance for Responding to Non-Compliance with Services

Transitional Housing (TH) programs are designed to provide structure, support, and a clear pathway to permanent housing. Participation in services is a core component of the program model. This guidance outlines a graduated, supportive, and **reversible** approach to addressing non-compliance with required services. The intent is not punitive, but to re-engage participants, reinforce expectations, and preserve housing whenever possible.

At every stage, staff should use professional judgment, trauma-informed engagement, and individualized problem-solving, recognizing that non-compliance is often a signal of barriers rather than unwillingness.

Layered Response Framework

1. Case Manager Engagement (First Response): The goal at this stage is re-engagement and course correction, not escalation.

- Address non-compliance directly through timely, respectful engagement
- Review service expectations and clarify unmet requirements
- Explore barriers, changing circumstances, or misunderstandings
- Adjust service plans, schedules, or engagement methods as appropriate
- Clearly communicate expectations and next steps

2. Case Conference (Collaborative Review): This step promotes consistency, fairness, and shared decision-making.

- Convene supervisory staff and relevant partners
- Review context, history, and prior engagement efforts
- Assess whether expectations remain reasonable and appropriate
- Identify additional supports or accommodations
- Determine whether escalation is warranted and document the rationale

3. Preliminary Notice of Rent Support Risk: This notice serves as a warning and opportunity, not a final action.

- Issue a written notice that rent assistance may be suspended
- Clearly describe unmet requirements
- Identify steps to return to compliance
- Provide a reasonable timeframe for re-engagement
- Reinforce that assistance can be fully restored upon compliance

4. Suspension of Rent Assistance (Last Resort): Suspension is a programmatic tool, not an automatic discharge.

- Temporarily suspend rent payments only after all prior steps
- Require leadership approval and clear documentation
- Provide written notice of the action
- Continue outreach and engagement efforts

Restoration and Flexibility

Programs should maintain flexibility to restore assistance if the unit is still available. At any point, if the participant resumes meaningful engagement with required services:

- Rent payments must be eligible for immediate restoration with retroactive payments making the landlord whole.
- Participants may be fully reinstated without penalty
- Past non-compliance must not delay restoration
- Re-entry should focus on stabilization and forward progress

Grievance and Appeal Process

Filing a grievance does not prevent continued engagement. If compliance resumes, assistance should be eligible for immediate restoration regardless of appeal outcome.

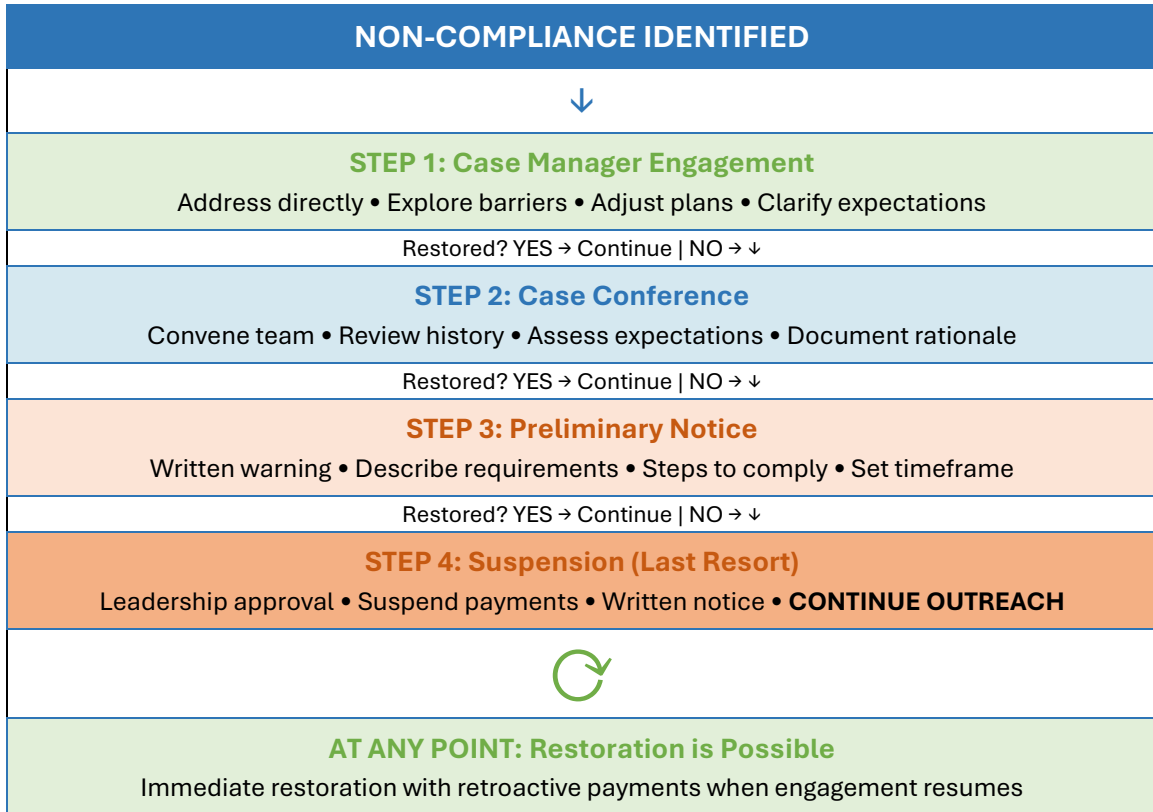
- Participants must be informed of their right to file a grievance or appeal
Information should be provided verbally and in writing
Processes must be accessible and accommodate disabilities or language needs
- Appeals should be reviewed by staff not involved in the original decision when possible
- Participants may present information and explain circumstances
- A written response must be provided within a reasonable timeframe

Key Principles

1	Responses must be progressive, proportional, and reversible
2	Engagement and problem-solving are prioritized over enforcement
3	Expectations must be clear, reasonable, and consistently applied
4	Documentation should reflect support efforts, not just enforcement

Staff Review Flowchart

Quick Reference Guide for Addressing Non-Compliance



Goal: Re-engagement and housing preservation, not punishment