



WRITTEN STANDARDS

*Developed for Housing and Services funded through
McKinney-Vento Homeless Assistance Programs*

Version 5

July 25, 2019

TABLE OF CONTENTS

Introduction	6
COC & ESG PROGRAMS-WRITTEN STANDARDS MINIMUM REQUIREMENTS	
1. Coordinated Intake and Referral System	6
2. Homeless Management Information System	9
3. Personnel Requirements	10
4. Coordination with Mainstream and Targeted Homeless Providers	11
5. Discharge Planning	11
6. Educational Assurances	11
7. Preventing Involuntary Family Separation	12
8. Affordable Care Act	12
9. Timeliness of Expenditures	12
10. Performance Standards	12
11. Fair Housing	12
12. Title VI of The Civil Rights Act	13
13. Section 504 Of the Rehabilitation Act of 1973.....	13
14. Title II of The Americans With Disabilities Act	13
15. Equal Access Rule	13
16. Nondiscrimination/Equal Opportunity/Affirmative Action	14
17. Violence Against Women Act 2013 (VAWA) /Emergency Transfer Plan	15
18. Drug Free Workplace	16
19. Lobbying Requirements	17
20. Termination and Grievance Procedures	17
21. Record Keeping Requirements for All Projects	18
22. Written Standards Monitoring	18

ESG PROGRAMS ONLY-WRITTEN STANDARDS MINIMUM REQUIREMENTS

1.	Participant Eligibility	19
2.	Program Coordination	20
3.	Income Determination	22
4.	Connection with Other Resources	22
5.	Termination of Assistance	23
6.	Lead-Based Paint	24
7.	Safety, Sanitation & Privacy	24
8.	Conflicts of Interest	24
9.	Homeless Participation	25
10.	Faith-Based Activities	25
11.	Program Income	26
12.	Recovered Materials	26
13.	Displacement	26
14.	Records & Recordkeeping	27

STREET OUTREACH, EMERGENCY SHELTER & TRANSITIONAL HOUSING MINIMUM STANDARDS

1.	Street Outreach Minimum Standards	29
2.	Emergency Shelter Minimum Standards	30
3.	Transitional Housing Minimum Standards	32

HOMELESS PREVENTION AND RAPID RE-HOUSING STANDARDS

1.	Eligibility/Prioritization	33
2.	Participant Contribution	36
3.	Rental Assistance Duration and Adjustment	36
4.	Service Type, Amount, & Duration	36
5.	Re-Evaluations	40

COCONTINUUM OF CARE PROGRAMS ONLY-WRITEN STANDARDS MINIMUM REQUIREMENTS

1. Overview41

2. Program Components and Eligible Activities42

TRANSITIONAL HOUSING PROGRAMS

1. Client Intake Process42

2. Housing Criteria43

3. Case Management Services44

4. Service Coordination45

5. Termination of Assistance46

6. Follow Up Services46

7. Client Files/Recordkeeping47

8. Evaluation & Planning47

PERMANENT (SUPPORTIVE) HOUSING PROGRAMS

1. Client Intake Process/Order of Priority48

2. Housing Criteria52

3. Case Management Services53

4. Service Coordination54

5. Termination of Assistance55

6. Follow Up Services55

7. Client Files/Recordkeeping56

8. Evaluation & Planning56

9. Housing First Approach57

RAPID RE-HOUSING (RRH) PROGRAMS

1. Core Components of the CoC RRH program59

2. Screen-In Process59

3. Prioritizing Rapid Re-Housing60

4. Participant Eligibility and Intake Process62

5.	RRH Performance Benchmarks	63
6.	Minimum Standards	63
7.	Housing Criteria	64
8.	Case Management Services	65
9.	Service Coordination	66
10.	Termination of Assistance	66
11.	Follow-up Services	67
12.	Client Files and Record Keeping	67
13.	Evaluation and Planning	68
14.	Eligible Cost Summary/Structuring Financial Assistance	69
15.	Lead based Paint	70
16.	SAFETY, SANITATION & PRIVACY	70
17.	CONFLICTS OF INTEREST	70
18.	PROGRAM INCOME	71
19.	HOUSING FIRST APPROACH	71
	Definitions	73
	Exhibits	77
	Attachments	83

INTRODUCTION

These Written Standards apply to all publicly funded housing and service providers. These standards must consistently be applied for the benefit of all program participants. Appalachian Regional Coalition on Homelessness (COC), a local planning body that coordinates housing and services funding for homeless families and individuals, encompasses the following Counties: Washington, Carter, Unicoi, Sullivan, Greene, Johnson, Hawkins and Hancock Counties. Appalachian Regional Coalition on Homelessness (COC) has developed the following standards for providing assistance using McKinney-Vento Homeless Assistance funds. Included is the Emergency Solutions Grant (ESG) program, and Programs funded through the CoC. These standards were created by the COC Director of Homeless Programs, in accordance with the interim rule for the Emergency Solutions Grant Program released by the U.S. Department of Housing and Urban Development (HUD) on December 4, 2011, and the final rule for the definition of homelessness also released by the HUD on December 4, 2011; and the Continuum of Care Program Interim Rule released by HUD on July 31, 2012. These standards do not re-place policies and procedures created by homeless services providers, but rather they provide an overall context for programs funded with federal, state and local funding. Programs that receive Continuum of Care Program (CoC) and Emergency Solutions Grant Funding (ESG) must abide by the Written Standards. Programs funded through other sources are highly encouraged to follow these standards.

The CoC expects that the standards will adjust as programs evolve, members gain more experience, and HMIS data from programs and services is analyzed. The standards may serve as the guiding principles for funding ESG and CoC funded Programs.

Each ESG and CoC funded recipient and sub-recipient shall comply with the minimum written standards for providing assistance established by the CoC. All funds used to provide services to clients served by these programs, including any match and program income funding, shall comply with these same requirements.

Each ESG and CoC funded recipient and sub-recipient may decide to set standards on their provision of assistance that exceeds these minimum standards but will at the very least comply with the following guidelines.

1. COORDINATED INTAKE AND REFERRAL SYSTEM

The Department of Housing and Urban Development (HUD) has mandated that all Continuum of Care (CoC) funded service providers use a localized coordinated intake, assessment, and referral system. Under the authority of 24 CFR 578.7(a)(8), HUD has established new requirements that Continuums of Care (CoC) and recipients of CoC Program Funds and Emergency Solutions Grants (ESG) Program 24 CFR Part 578.23(c) funding must meet related to the development and use of a centralized or coordinated assessment system. All CoC funded agencies must participate in the local assessment

effort, which ensures homeless persons, including chronically homeless individuals and families, families with children, veterans and their families, and any unaccompanied youth, are referred to available resources. The COC governs service provisions and standards.

All CoC Program and ESG -funded agencies must accept referrals only through the Coordinated Appalachian Resource Extension (CARE) Access Points which are located at the COC office, Bristol Salvation Army, ETSU Downtown Day Center for the Homeless and from the Priority List that is created through the CoC's coordinated entry process. This will assure that there is a single prioritized list of chronically homeless individuals within the CoC. This list will be referred to as the Priority List and must be updated on a daily basis at the COC CARE access points to reflect the most up-to-date and real-time data as possible. The Priority List must be purged every 60 days (Notice CPD-17-01). Acceptance of an ESG award means the sub-recipient agrees to utilize the centralized assessment or coordinated assessment system implemented by the local CoC.

A victim service provider may choose not to use the CoC's centralized or coordinated assessment system. Agencies that do not use HMIS can partner with Coordinated Entry staff to make alternate arrangements for referring participants to the prioritization list. However, as provided in section 24 CFR 578.23(c)(9), a victim service provider may choose not to use the CoC's coordinated entry process, if victim service providers in the area use a coordinated entry process that meets HUD's requirements and the victim service provider uses that system instead.

Participants can access the system through the toll free number (1-844-989-CARE). Participants can use the system through a "no wrong door" approach because all agencies will connect people to the system. The system will be well advertised in the community and cover the CoC geographic area. The toll free CARE Access number is posted on the COC web site. Coordinated Entry is the avenue for managing the prioritization lists for chronically homeless individuals and families, Rapid Rehousing, Homeless Prevention, and Permanent Supportive Housing.

Coordinated Entry staff track requirements for CoC & ESG housing and shelter services, including participant eligibility requirements. Agencies are required to provide accurate and up to date information on populations served and other requirements. The HMIS Administrator will make this information publicly available on the COC website and disseminate this information to COC members annually.

- A. Minimum Standards for Coordinated Entry are:
 - i. Prioritization: Ensure that the most vulnerable participants are served first by using the VI-SPDAT, length of homelessness, chronic homeless status, and severity of need.

- ii. Low Barrier: Coordinated Entry staff partner with programs that support low barriers to service access. Participants are served through Coordinated Entry regardless of income level, drug or alcohol use, criminal background, or history of domestic violence.
- iii. Documenting Homeless Status: Documentation, or the lack of documentation, must not keep someone from receiving emergency crisis services. The safety of individuals should be the top priority. An intake worker should never contact somebody that the individual fears will put them at risk of harm, even if that person could verify details the individual is providing. Document the situation accurately and adequately by describing the circumstances, but do not put people in harm's way for the sake of third-party verification. Individuals are not responsible for obtaining their own documentation. Instead, intake workers are responsible for documenting someone's homeless status using contact information provided by the person during the intake interview. If documentation cannot be obtained, intake workers should document their due diligence in attempting to obtain the documentation. Consider creating a standardized form to track due-diligence.
- iv. Housing First Orientation: The purpose of the system is to house participants as quickly as possible. Once housed, projects also should not terminate clients regardless of whether or not they participate in supportive services, make progress on a service plan, lose their income or based on other activities not covered in a lease agreement typically found for an unassisted person in the project's geographic area. All CoC and ESG funded programs must adopt the Housing First and Low Barriers approach. The CoC will authorize limited exceptions for projects in the adoption of a housing first model where it conflicts with funder requirements or local/state law (e.g. Restrictions on serving people who are listed on sex offender registries)
- v. Person-Centered: Participants can accept or deny services from any agency without losing their spot on the prioritization list.
- vi. Shelter Access: The toll free CARE number is available 8 hours/day to access shelter.
- vii. Fair and Equal Access: All participants in the CoC geographic area can access services through the toll free number and the "no wrong door" approach. (Services are offered in English and Spanish.)
- viii. Standardized Assessment: All agencies will refer to COC CARE Access points for Coordinated Entry Assessment. Coordinated Care Specialists will use the VI-SPDAT for client assessments at all access points and enter the data into HMIS.
- ix. Inclusive: All subpopulations can access Coordinated Entry the same way, but will be directed to different access points for effective services.
- x. Referral Protocols: Coordinated Entry will refer participants to appropriate shelter and housing services including ESG and CoC funded projects. CoC and ESG funded projects are required to fill housing vacancies using the prioritization list in HMIS. All other projects are encouraged to use the community lists. Programs accepting people from Coordinated Entry should contact the COC to remove people from the HMIS

prioritization list. (List will be purged every 60 days) In the event a Program denies services to a family or individual a written reason for the denial must be sent to the Coordinated Care Specialist justifying the rejection of a referral. The Coordinated Care Specialist will then refer the family or individual to another project.

- xi. Outreach: Street outreach efforts will include referral to the Coordinated Entry Access Point.
- xii. Full Coverage: Coordinated Entry will serve any participant experiencing homelessness or at risk of homelessness in the 8 County Service Region.
- xiii. Reasonable Accommodation: A person with a disability may request reasonable accommodation in order to complete the coordinated entry process at a different location other than an Access Point.
- xiv. Participant Autonomy: The coordinated entry process must allow participants autonomy to freely refuse to answer assessment questions and to refuse housing and service options without retribution or limiting their access to assistance. The participants will maintain their place in coordinated entry prioritized list when the participant rejects options.
- xv. Safety Planning: The CoC will ensure at a minimum that people fleeing or attempting to flee domestic violence and victims of trafficking have safe and confidential access to the coordinated entry process and victim services, including access to the comparable process used by victim service providers, as applicable, and immediate access to emergency services such as domestic violence hotlines and shelters.

2. HOMELESS MANAGEMENT INFORMATION SYSTEM (CASE WORTHY)

COC recipients and ESG sub-recipients, except for victim service providers, must utilize the Continuum of Care (CoC) Case Worthy (CW) database designated by the CoC. This database is designated to record and store client-level data, including the characteristic and service needs of the homeless and at-risk of homelessness communities. Utilization of the HMIS database will help provide a consistent and accurate snapshot of populations served through various programs.

Agencies utilizing the HMIS database are expected to comply with data quality standards. Information shall be entered into the database in a timely manner (within 24 hours of program entry) and shall be updated to provide exit information (within 24 hours of program exit), income data, and shall have limited number of fields with “Don’t Know”, “Refused” or “Missing”. Note: Rapid re-housing client employment data may be entered annually at recertification, however non-cash and other cash income sources should be updated as received.

Note: Victim service providers shall actively utilize the HMIS comparable database system designated

By the COC and ESG program administrators and shall comply with the data quality standards set forth by the COC and ESG programs.

Fees. Per COC Board Resolution No. 2014-08, approved and adopted on January 28, 2014 to amend CoC Policies and Procedures to include Part XII, Fees, and amended on September 15, 2016: Participation Fees shall be 2% of all participants' annual grant award whose funding agency requires data be submitted to HMIS.

3. PERSONNEL REQUIREMENTS

COC recipients and ESG sub-recipients shall make certain that programs targeted to homeless and at-risk of homelessness populations are adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

At a minimum, agencies shall ensure the following standards are in place for programs funded through COC and ESG grants;

- a. Agencies shall select, for its service personnel, only those employees and/or volunteers with appropriate knowledge, or experience, for working with individuals and families experiencing homelessness.
- b. Agencies shall have a written plan for, and provide training to, all paid and volunteer staff in both the policies and procedures employed by the program, and in specific skill areas as determined by the program.
- c. All paid and volunteer service personnel shall participate in ongoing internal and/or external training, which will further enhance their knowledge and ability to work with individuals and families experiencing homelessness.
- d. For programs that use HMIS, all users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual provided by the HMIS Lead Agency. Additionally, user must adhere to privacy and confidentiality terms set forth in the User Agreement.
- e. Agency personnel with the responsibility for supervision of the casework counseling, and/or case management components have, at a minimum, a Bachelor's degree in a human service-related field and/or experience working with individuals and families experiencing homelessness, poverty, disabilities, or other similar challenges. If the agency is located in a community without access to personnel with at least a Bachelor's degree in a human service-related field and/or having the required experience, the agency must include strategies to ensure caseworkers have access to training that will provide housing and case management skills needed for the long-term success of clients served by these programs.

- f. All personnel shall have a written job description that at a minimum addresses major tasks to be performed and the qualifications required for the position.
- g. The program shall ensure all paid and volunteer service personnel are familiar with HUD's Fair Housing and Equal Opportunity requirements under 24 CFR 5.105(a); and the new "Equal Access to Housing Final Rule (77 FR 5662).
- h. Supervisors shall ensure quality/coordinated services.

4. COORDINATION WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

The COC expects providers receiving funds through ESG and COC programs to maximize the use of available Federal, State and local mainstream resources to ensure the long-term stability of program participants. Providers shall actively seek to engage in partnerships with programs and services that are targeted to address homelessness and poverty within their communities. The CoC expects that every agency that is funded through the CoC or ESG programs will coordinate with and access mainstream and other targeted homeless resources. Providers should assess and assist participants with obtaining any mainstream resource for which they may be eligible for including: TANF, Public Assistance, Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Medicare, SSI/SSDI, or Access-VR. Where possible, providers should streamline processes that include applying for mainstream benefits such as the use of a singular form to apply for benefits or collecting all necessary information in one step. The SSI/SSDI Outreach Access and Recovery (SOAR) process is encouraged to speed up the SSI/SSDI process.

5. DISCHARGE PLANNING

Each CoC service provide must develop and implement, to the maximum extent practicable, policies and protocols for the discharge of persons from public funded institutions and systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. (42 USC 11362).

6. EDUCATIONAL ASSURANCES

The COC expects providers to collaborate with local education authorities to assist in the identification of individuals and families who become or remain homeless and are informed of the eligibility for services under subtitle B of the title VII of the Act. This includes demonstrating that providers establish policies to ensure all children are enrolled in early childhood programs or in school and connected to appropriate services in the community. Providers shall collaborate with local school districts and early childhood education providers to identify homeless households with children to ensure they understand their eligibility for educational services.

7. PREVENTING INVOLUNTARY FAMILY SEPARATION

Maintaining family unity is important when homeless households with children under the age of 18 enter homeless shelters or housing. The COC expects providers to ensure homeless households with children under the age of 18 are not denied admission and are not separated.

8. AFFORDABLE CARE ACT

The COC expects providers to include enrollment and outreach activities to ensure households have access to healthcare options, including Medicaid.

9. TIMELINESS OF EXPENDITURES

Once activities begin, the ESG sub-recipient or COC recipient must draw down funds at least once per quarter and make every effort to ensure all grant funds are expended by grant close-out. ESG sub-recipients who are not on target to expend all funds by the deadline may be at risk of grant recapture by THDA. ESG sub-recipient's new grant year begins July 1st of each fiscal year, and expenditures may be reimbursed for expenses that occur after July 1st for each grant awarded. Each grant term has a term of 12 months. For COC recipients, the Operating Start Date (OSD) indicates when the term of the grant begins, that is, when the project begins to serve homeless persons, and sets the beginning of the 12-month program year for spending and reporting. For non-construction projects, the OSD is determined as the first day of the month in which the recipient begins incurring eligible operating, supportive service, leasing or rental assistance.

10. PERFORMANCE STANDARDS

The COC expects providers to design programs which will address the needs of the homeless and at-risk of homelessness populations, with the end result of reducing and ending homelessness. The COC will evaluate performance of each provider based on outcomes achieved. Outcomes are outlined and updated in the Performance Standards adopted by the HMIS Steering Committee. These outcome measures will be used to evaluate program success annually. The COC will use this and other performance metrics to guide funding decisions for ESG and CoC-funded programs.

** See Attachment C*

11. FAIR HOUSING ACT

Recipients/sub-recipients must comply with Title VIII of the Civil Rights Act of 1968. This is commonly known as the Fair Housing Act (FHA) and defines housing discrimination as the "refusal to sell or rent a dwelling to any person because of his race, color, religion, or national origin". Later, the disabled and families with children were added to this list. The Office of Fair Housing and Equal

Opportunity within the U.S. Department of Housing and Urban Development is charged with administering and enforcing this law.

12. TITLE VI OF THE CIVIL RIGHTS ACT:

Recipients/sub-recipients must comply with Title VI of the Civil Rights Act of 1968 which prohibits discrimination on the basis of race, color, or national origin under any program receiving Federal financial assistance. Recipients are also required to take reasonable steps to ensure meaningful access to programs and activities for Limited English proficiency (LEP) persons.

13. SECTION 504 OF THE REHABILITATION ACT OF 1973

Recipients/sub-recipients must comply with Section 504 of the Rehabilitation Act of 1973 (The Act). Pursuant to the requirement of The Act, recipients/sub-recipients must ensure that no otherwise qualified disabled person shall, solely by reason of their disability be excluded from the participation in, be denied the benefits of, or be subject to discrimination, including discrimination in housing or employment, in any program or activity that receives or benefits from federal financial assistance. The recipient/sub-recipient must also ensure that requirements of The Act shall be included in the agreements with and be binding on all of its recipients/sub-recipients, contractors, and subcontractors, assignees or successors steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI and Executive Order 13166, sub-recipients are also required to take reasonable steps to ensure meaningful access to programs and activities for Limited English proficiency (LEP) persons.

14. TITLE II OF THE AMERICANS WITH DISABILITIES ACT

Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance. Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

15. EQUAL ACCESS RULE

In addition, HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG

Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

16. NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE ACTION

Minimum standards shall comply with the requirements for nondiscrimination equal opportunity and affirmative outreach identified in 24 CFR 576.407 (a-b). In addition, providers receiving ESG funding shall follow HUD’s “Equal Access to Housing in HUD Programs, Regardless of Sexual Orientation or Gender Identity” final rule, published on September 21, 2016. Provider’s shall train program staff and contractors so as to ensure that employees and contractors who interact directly with potential clients and current clients are aware of this rule and take prompt corrective action to address any noncompliance.

Refer to CPD Notice 15-02 for further guidance.

Ruling

Determination of eligibility for housing that is assisted by HUD or subject to a mortgage insured by the Federal Housing Administration shall be made available without regard to actual or perceived sexual orientation, gender identity or marital status.

Per HUD Equal Access in Accordance with an Individual’s Gender Identity in Community Planning and Development Programs Rule, all individuals have equal access to HUD-assisted programs in accordance with their gender identity. Providers who operate single-sex projects using funds awarded through the Office of Community Planning and Development (CPD) are required by the rule to provide all individuals, including transgender individuals and other individuals who do not identify with the sex they were assigned at birth, with access to programs, benefits, services, and accommodations in accordance with their gender identity without being subjected to intrusive questioning or being asked to provide documentation.

All service providers within the CoC receiving HUD funding must establish, amend, or maintain program admissions, occupancy, and operating policies and procedures, including policies and procedures to protect individuals’ privacy and security, so that equal access is provided to individuals based on their gender identity. This requirement includes tenant selection and admission preferences.

Furthermore, eligible families, regardless of marital status, sexual orientation, or gender identity, will have the opportunity to participate in HUD programs. The term “family” includes a single person and families with or without children. HUD ruling clarifies that otherwise eligible families may not be excluded because one or more members of the family may be an LGBT individual, have an LGBT relationship, or be perceived to be an individual or in such relationship.

All service providers within the CoC receiving HUD funding must comply with the following:

- a. It is prohibited under the Fair Housing Act for any landlord or housing provider to discriminate against LGBTQ persons because of their real or perceived gender identity or any other reason that constitutes sex-based discrimination.

- b. It is illegal for any landlord or housing provider to deny housing because of someone's HIV/AIDS status under the Fair Housing Act and the Americans with Disabilities Act.
- c. It is prohibited for a lender to deny an FHA-insured mortgage to any qualified applicant based on their sexual orientation, gender identity, or marital status.
- d. It is prohibited for any landlord or housing provider who receives HUD or FHA funds to discriminate against a tenant on the basis of real or perceived sexual orientation, gender identity or marital status.
- e. It is prohibited for all homeless facilities to segregate or isolate transgender individuals solely based on their gender identity.
- f. All service providers will post HUD's Office of Fair Housing and Equal Opportunity hotline 1-800-669-9777 in a prominent location for clients who believe they have been discriminated against.

17. VIOLENCE AGAINST WOMEN ACT OF 2013 (VAWA)

On November 16, 2016 the U.S. Department of Housing and Urban Development published the final rule regarding housing protections for victims of domestic violence, dating violence, sexual assault, or stalking (Federal Register Document #2016-25888). This final rule prohibits an applicant for assistance or tenant assisted under a covered housing program from being denied assistance under, denied admission to, terminated from participation in, or evicted from housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, so long as the applicant otherwise qualifies for admission assistance, participation or occupation (24 CFR 5.2005 (b)(1)).

In addition, the VAWA Final Rule requires that each covered housing provider produce a detailed emergency transfer plan, which ensures that a tenant receiving rental assistance through or residing in a unit subsidized under a covered housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer within the criteria stated in 24 CFR 5.2005 (e)(2).

- A. **ARCH CoC's Emergency Transfer plan, Attachment 1**, encompasses all CoC, Emergency Solutions Grant (ESG), and HOME funded programs. All covered housing providers must maintain records on emergency transfers requested under 24 CFR 5.2005(e). Data must include the outcomes of each request and must be provided to ARCH upon request. VAWA in no way limits the authority of the covered housing program to terminate assistance or evict a tenant under a covered housing program if the provider can demonstrate that an actual and imminent threat to other tenants or those employed at or providing service to the property of the covered housing provider would be present if that tenant is not evicted or terminated (24 CFR 5.2005 (d)(3)). The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. All CoC and ESG recipients and sub recipients must follow this plan and include the Emergency Transfer Plan in your program policy and

procedures. A new certification form of documenting incidents of Domestic violence, dating violence, sexual assault, and stalking (Appendix E) must be used by housing providers.

18. DRUG-FREE WORKPLACE

Recipients/sub-recipients are required to adopt a drug-free workplace policy that certifies that the recipient/sub-recipient will or will continue to provide a drug-free workplace by:

- a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the recipient/sub-recipient workplace and specifying the action that will be taken against employees for violation of such prohibition.
- b. Establishing an ongoing drug-free awareness program to inform employees about:
 - i. The dangers of drug abuse in the workplace;
 - ii. The Recipient/sub-recipient's policy of maintaining a drug-free workplace;
 - iii. Any available drug counseling, rehabilitation, and employee assistance programs;
 - iv. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
- c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 8.1(a);
- d. Notifying the employee in the statement required by paragraph 8.1(a), that, as a condition of employment under the grant, the employee will:
 - i. Abide by the terms of the statement; and
 - ii. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five (5) calendar days after such conviction.
- e. Notifying THDA in writing, within ten (10) calendar days after receiving notice from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the federal agency has designated a central point for the receipt of such notices. Notices shall include the identification number(s) of each affected grant.
- f. Taking one of the following actions, within thirty (30) calendar days of receiving notice), with respect to any employee who is so convicted:

- i. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - ii. Requiring such employee to participate satisfactorily in a drug-abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law-enforcement, or other appropriate agency.
- g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of 11 (a) through (f).
- h. All CoC and ESG grant recipients will serve all populations of people. ESG funding will not be limited to one population. Recipients/sub-recipients may target certain populations but not deny services to those who do not fall into their target populations. Recipients/sub-recipients are required to administer in good faith a policy designed to ensure that each assisted homeless facility is free from the illegal use, possession or distribution of drugs or alcohol by its beneficiaries. This requirement will apply as long as the assisted facility is used as a facility for the homeless. This provision is not to be used to deny ESG homeless assistance to any recipient acting in good faith; nor will it be used to allow shelter operators to deny assistance to individuals suspected of drug or alcohol abuse. The intent is to provide a safe environment within homeless shelters.

19. LOBBYING REQUIREMENTS

No federally appropriated funds will be paid or will be paid by or on behalf of the sub-recipient, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, and entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement. Recipients/sub-recipients shall require the language of this certification in the award documents at all tiers.

20. TERMINATION & GRIEVANCE PROCEDURES

Providers must have a written termination policy outlining program rules and termination processes including a formal grievance process. This process, at minimum, must consist of: (1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (2) Written notice to the program participant containing a clear statement of the reasons for termination; (3) A review of the decision, in which the program 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; and (4) Prompt written notice of the final decision to the program participant.

21. RECORD KEEPING REQUIREMENTS FOR ALL PROJECTS

Participant Recordkeeping Requirements include:

- a. All records containing personally identifying information must be kept secure and confidential
- b. Programs must have a written confidentiality/privacy notice, provided to the participant if requested.
- c. Documentation of homelessness (following HUD guidelines)
- d. A record of services and assistance provided to each participant
- e. Documentation of any applicable requirements for providing services/assistance
- f. Documentation of use of the coordinated assessment system
- g. Documentation of use of HMIS
- h. Records must be retained for the appropriate amount of time as prescribed by HUD.

Financial Recordkeeping Requirements include:

- a. Documentation for all costs charged to the grant
- b. Documentation that funds were spent on allowable costs
- c. Documentation of the receipt and use of program income
- d. Documentation of compliance with expenditure limits and deadlines
- e. Retain copies of all procurement contracts as applicable
- f. Documentation of amount, source and use of resources for each match contribution.

22. WRITTEN STANDARDS MONITORING

The procedures outlined in this CoC and ESG policy and procedure manual will be regularly monitored and evaluated on the basis of best practices, efficiency, productivity, availability, and ability of administration. Adjustments may be made only to the procedure manual as needed and in accordance with the ESG program guide (update August 26, 2013) and HUD updates. The policy and procedure manual will be made available to all participating CoC/ ESG recipients/sub-recipients to be administered accordingly. All CoC and ESG funded agencies will provide the COC with a copy of their individual program policies.

ESG PROGRAM ONLY-WRITTEN STANDARDS MINIMUM REQUIREMENTS

1. PARTICIPANT ELIGIBILITY:

Minimum standards for evaluating individual and family eligibility for assistance under the ESG program are:

a. Street Outreach:

People who qualify as “literally homeless” based on Category (1) (i)* of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): *engagement, case management, emergency health and mental health services, transportation and services to special populations*. Program participant files must include documentation that verifies homeless status.

**See Exhibit A, Exhibit C and Exhibit D*

b. Emergency Shelter:

People who qualify as “homeless” based on Category 1,2,3, or 4* of the homeless definition found at 24 CFR 576.2 are eligible for the following: *shelter, case management, child care, education, employment and life skills services, legal services, health and mental health services, substance abuse services, transportation*. Program participant files must include documentation that verifies homeless status. NOT ALLOWABLE: Mortgage and mortgage arrearage payments.

** See Exhibit, Exhibit C and Exhibit D*

c. Transitional Housing for the Homeless:

Note: Only transitional housing for homeless programs funded under FY 2010 Emergency Shelter Grant Program and met the criteria under the former emergency shelter definition (“any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless”) may continue to be funded under the Emergency Solutions Grant Program.

People who qualify as “homeless” based on Category 1 or 4* of the “homeless” definition found at 24 CFR 576.2 are eligible for the following: *housing, case management, child care, education, employment and life skills services, legal services, health and mental health services, substance abuse services, transportation and services for special populations*. Program participant files must include documentation that verifies homeless status.

** See Exhibit A and Exhibit D*

d. Rapid Re-Housing: People who qualify as “homeless” based on Category 1 or 4* of the “homeless” definition found at 24 CFR 576.2 and who are moving into a housing unit that meets HUD’s habitability and lead- based paint standards are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.104, 576.105, 576.106) Program participant files must include documentation that verifies homeless status * See Exhibit A, Exhibit C, and Exhibit D

1. **Housing Relocation and Stabilization Services:** moving costs, rent application fees, security deposits, last month's rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management
2. **Rental assistance:** short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.
3. **NOT ALLOWABLE:** Mortgage and mortgage arrearage payments

e. Homelessness Prevention

People who qualify for "at risk of homelessness" based on Category 2,3, or 4* of the "homeless" definition or based on the "At risk of homelessness" definition found at 24 CFR 576.2 and who resides in a housing unit that meets HUD's habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for the following services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106)

* See Exhibit A, Exhibit B, Exhibit C, and Exhibit D

- a. **Housing Relocation and Stabilization Services:** moving costs, rent application fees, security deposits, last month's rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management
- b. **Rental Assistance:** short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.
- c. **NOT ALLOWABLE:** Mortgage and mortgage arrearage payments.

2. PROGRAM COORDINATION

Minimum standards for program coordination consist of on-going system and program coordination and integration of ESG-funded activities to the maximum extent practicable with the following:

- a. Emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers;

- b. Other homeless assistance providers
 - 1. Shelter Plus Care Program
 - 2. HOPWA
 - 3. Other CoC Funded Programs
 - 4. Supportive Housing Program
 - 5. HUD-Veterans Affairs Supportive Housing (HUD-VASH)
 - 6. Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act)
 - 7. Grants for the Benefit of Homeless Individuals
 - 8. Healthcare for the Homeless
 - 9. Programs for Runaway and Homeless Youth
 - 10. Projects for the Assistance in the Transition from Homelessness
 - 11. Emergency Food and Shelter Program
 - 12. Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Programs
 - 13. Homeless Veterans Reintegration Program
 - 14. Domiciliary Care for Homeless Veterans Program
 - 15. VA Homeless Providers Grant and Per Diem Program
 - 16. Health Care for Homeless Veterans Program
 - 17. Homeless Veterans Dental Program
 - 18. Supportive Services for Veterans Families Programs, and
 - 19. Veterans Justice Outreach Initiative
 - 20. Cooperative Agreements to Benefit Homeless Individuals (CABHI) Grant
- c. Mainstream service and housing providers
 - 1. Public housing programs assisted under section 9 of the U.S. Housing Act of 1937
 - 2. Housing programs receiving Section 8 tenant-based or project-based assistance
 - 3. Supportive Housing for Persons with Disabilities
 - 4. Temporary Assistance for Needy Families
 - 5. Health Center Program
 - 6. State Children’s Health Insurance Program
 - 7. Head Start

8. Mental Health and Substance Abuse Block Grants
 9. Services funded under Workforce Investment Act; and
 10. Other state programs
- d. Continuum of Care (CoC) Networks
1. COC meetings
 2. Mayors Challenge
 3. Various other CoC subcommittee meetings

3. INCOME DETERMINATION

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income is defined as:

a. *Annual income means all amounts, monetary or not, which:*

1. Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
2. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
3. Which are not specifically excluded as defined under paragraph (C) of 24 CFR 5.60.
4. Annual income also means amounts derived (during the 12 month period) from assets to which any member of the family has access

ESG Program providers should refer to the ESG Program's Policies and Procedures Manual and ESG Program Guidelines manual for more details.

4. CONNECTION WITH OTHER RESOURCES

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

- a. Appropriate support services including:
1. Permanent housing
 2. Medical health treatment
 3. Mental health treatment
 4. Counseling
 5. Supervision; and

6. Other services needed for independent living.
- b. Other governmental and private assistance available to help with housing stability including:
 1. Medicaid
 2. Supplemental Nutrition Assistance Program
 3. Women, Infants and Children (WIC)
 4. Federal-State Unemployment Insurance Program
 5. Social Security Disability Insurance (SSDI)
 6. Child and Adult Care Food Program; and
 7. Other available assistance.

5. TERMINATION OF ASSISTANCE

At all times providers must follow Termination and Grievance Policies set forth by their agency. At a minimum, standards for termination of assistance are:

- a. **In general: if** a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases.
- b. **Program participants receiving rental assistance or housing relocation or stabilization services:** when terminating rental assistance or housing relocation and stabilization services, the required formal process shall minimally consist of:
 1. Written notice clearly stating the reasons for termination;
 2. Review of the decision that gives the participant opportunity to present objections to the decision maker; and
 3. Prompt written final notice.
- c. **Ability to provide further assistance:** termination will not bar the provider from providing later additional assistance to the same family or individual.

6. LEAD-BASED PAINT

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the lead-based remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead- Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35,

subparts A, B, H, J, K, M, and R.. Refer to ESG Program Policies and Procedures Manual and ESG Program Guidelines for further guidance.

7. SAFETY, SANITATION & PRIVACY

Minimum standards for all shelters and program participant-occupied housing consist of compliance with safety, sanitation and privacy requirements identified in 24 CFR 576.403. Refer to the ESG Program's Policies and Procedures Manual, and ESG Program Guidelines for detail instructions.

- a. Additional requirements for permanent housing: Providers shall not use ESG funding to help someone remain or move into housing if the housing does not meet minimum habitability standards. For new move-ins, inspections must occur prior to execution of a landlord/provider agreement and landlord/tenant lease. If a program participant is expected to eventually access subsidized housing, such as the Section 8 Housing Voucher Program, the provider should make certain the housing unit meets any additional health and safety requirements of that program.

8. CONFLICTS OF INTEREST

Minimum standards for conflicts of interest are: Conflicts of Interest: Sub-recipients must keep records to show compliance with the conflicts-of-interest requirements in 24CFR 579.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements of 24 CFR 576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions. Sub-recipient Conflict of Interest policies must also include instructions to agency staff that may be in the situation of needing assistance themselves, or providing assistance to close friends or family members, to ensure that ESG funds are not used inappropriately.

- a. Organizational conflict of interest:
 1. ESG assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent.
 2. No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.
- b. Individual conflicts of interest:
 1. When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government).
- c. All transactions/activities:

1. Conflicts prohibited – No persons involved with the ESG program or who is in a position to participate in a decision-making process or gain inside information regarding the program activities, shall obtain a financial interest or benefit from an assisted activity; or have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds (either himself or herself or those with whom he or she has family or business ties) during his or her tenure or for one year following tenure.
2. Persons covered – These conflict of interest provisions applies to any employee, agent, consultant, officer or elected or appointed official of the provider's agency.
3. Exceptions – A provider may request an exception to these provisions from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404.

9. HOMELESS PARTICIPATION

Minimum standards for homeless participation are:

- a. To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG-funded facilities, in providing services under ESG and in providing services for occupants of the ESG-funded facilities 24 CFR 576.405.

10. FAITH-BASED ACTIVITIES

Minimum standards for faith-based activities 24 CFR 576.406 are:

- a. Providers receiving ESG funding shall not engage in inherently religious activities as part of the ESG-funded programs or services. Such activities must be offered separately from ESG-funded programs and services and participation must be voluntary.
- b. A religious organization receiving ESG funding retains independence from government and may continue with its mission provided that ESG funds are not used to support inherently religious activities. An ESG-funded organization retains its authority over its internal governance.
- c. An organization receiving ESG funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs.
- d. ESG funding shall not be used for rehabilitation of structures used specifically for religious activities but may be used for rehabilitating structures that are used for ESG-eligible activities.

11. PROGRAM INCOME

Minimum standards for program income earned during the project period are that program income shall be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income shall be retained.

12. RECOVERED MATERIALS

Minimum standards for the procurement of recovered materials shall comply with the requirements identified in 57 CFR part 576.407(f), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resources recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

13. DISPLACEMENT

Minimum standards for minimizing the displacement of persons (families, individuals, business, nonprofit organizations, and farms) as a result of a project assisted under ESG shall comply with 24 CFR part 576.408 and consist of:

- a. **Minimizing displacement:** consistent with ESG goals and objectives, the providers shall minimize displacing people as a result of ESG-funded projects.
- b. **Temporary relocation not permitted:** no temporary relocation shall be required for an ESG-funded project. When a tenant has to move for an ESG-funded project, the tenant shall be treated as permanently displaced and offered relocation assistance and payments.
- c. **Relocation assistance for displaced persons:** in general, a displaced person shall be provided relocation assistance and advised of his or her Fair Housing Rights. A Displaced Person is defined as any person that moves from a permanent home as a result of ESG-funded acquisition, rehabilitation, or demolition of a project.
- d. **A person does not qualify as a “displaced persons” if the person:**
 1. Was evicted based on a violation of the lease or occupancy agreement; violation of the law; and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
 2. Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a “displaced persons”.
 3. The person is ineligible under 49 CFR 24.2

4. HUD determines that the persons were not displaced as a result of the project.

The State or the provider may request that HUD determine whether or not a displacement would be covered by this rule.

- e. **Real property acquisition requirements:** the acquisition of real property for an ESG funded project is subject to the URA and Federal government wide regulations.
- f. **Appeals:** a person who disagrees with determination concerning whether the persons qualifies as a displaced persons, or the amount of relocation assistance, may file a written appeal. A low-income persons who disagrees with determination may submit a written request for review of that determination by HUD.

14. RECORDS & RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow and HUD to determine whether ESG requirements are being met, and if they comply with 24 CFR 576.500.

- a. Program participant records shall include written:
 1. Determination and verification/certification that the program participant met the criteria for being Homeless or At-Risk of Homelessness, and that an effort was made to obtain written third- party verifications, when possible and applicable.
**See Exhibit D;*
 2. Determination and verification/certification that the program participant was eligible or ineligible for the particular services and/or financial assistance;
 3. Determination and verification/certification that the program participant lacked sufficient resources and support networks to provide the assistance; (But for)
 4. Determination and verification/certification that the program participant met income requirements and that an effort was made to obtain written third-party verifications, when possible and applicable; **HP CLIENTS ONLY (30% of HUD Area Medium Income) (AMI) <https://www.huduser.gov/portal/datasets/il.html>**
 5. Identification of the specific services and financial assistance amounts that were provided to the program participant;
 6. When applicable, verification that the services were terminated in compliance with 24 CFR 576.402;
 7. When adopted by the Continuum of Care, a copy of the CoC-approved centralized or coordinated assessment of the program participant; copies of leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with the fair market rent (FMR) <https://www.huduser.gov/portal/datasets/fmr.html>, rent reasonableness, and utility allowance requirements; <https://www.huduser.gov/portal/resources/utilallowance.html>

8. Determination and verification that at a minimum, the housing unit met HUD's habitability and lead-based paint standards;
 9. Copy of individualized housing stability plan;
 10. Notes verifying case management services were provided at least monthly;
 11. Notes verifying program participants' eligibility was re-evaluated at least every 3 months for homeless prevention services or at least annually for rapid re-housing services.
 12. Notes verifying program participant was assisted to obtain mainstream and other resources.
- b. Program policies and procedures shall indicate:
1. Services are coordinated with the Continuum of Care, other homeless assistance/prevention programs and mainstream service and assistance programs;
 2. Compliance with HUD's ESG (24 CFR 576) requirements for:
 - a. Shelter and housing standards
 - b. Conflict of interest
 - c. Homeless participation
 - d. Faith-based activity
 - e. Nondiscrimination, equal opportunity, affirmative outreach, and compliance with HUD's transgender policies
 - f. Uniform administrative rules (24 CFR part 84)
 - g. Lobbying and disclosure (24 CFR part 87)
 - h. Displacement, relocation and acquisition
 - g. Procurement (24 CFR 84.40-84-48)
- c. Program participant records are kept secure and confidential
- d. Participation in HMIS or comparable database selected by the Continuum of Care or, including timeliness of data entry and data quality expectations. (24 hours of program entry).

Financial records shall include:

- a. Supporting documentation for all costs charged to ESG grant, including evidence that rent checks are paid to the property owner.

- b. Documentation showing ESG funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles under 576.101-576.109 and the cost principles in OMB Circulars A-87 and A-122
- c. Documentation of appropriate and sufficient match including evidence of all match sources obtained, and documentation of expenditures of cash match for eligible grant expenses.
- d. Evidence that expenditures did not occur outside of the grant term
- e. Documentation regarding salary expenditures for grant-related activities
- f. Documentation of the receipt and use of program income
- g. Copies of procurement contracts.
- h. Sub-recipients must keep records of the source and use of contributions made to satisfy the matching requirements in 24 CFR 576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.
- i. Centralized and coordinated assessment procedures: Sub-recipients must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the CoC in accordance with the requirements established by HUD.

STREET OUTREACH, EMERGENCY SHELTER, AND TRANSITIONAL FACILITIES

MINIMUM STANDARDS

- 1. STREET OUTREACH MINIMUM STANDARDS
 - a. **Targeting/Engagement:** providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.
 - b. **Assessment/Service Provision/Referral/Prioritization**
 - 1. Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered the following Street Outreach services, as needed and appropriate: engagement, case management, emergency health and mental health, transportation services

2. When appropriate based on the individual's needs and wishes, the referral to permanent supportive housing or rapid re-housing can quickly assist the individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to an emergency shelter.

2. EMERGENCY SHELTER MINIMUM STANDARDS

An emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless, and which does not require occupants to sign leases or occupancy agreements. The following minimum standards shall be required of any emergency shelter funded through the Emergency Solutions Grant program:

Access to Shelter

- All shelters will participate in coordinated entry. All shelters are highly encouraged to assess clients for appropriate permanent housing placement. Shelters must refer clients to the coordinated entry system for assessment and explain to clients the process of accessing housing programs.
- All shelters are required to notify clients about how to access coordinated entry.
 - a. **Admission:** providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of "homeless" as specified in 24 CFR 573.2 (1, 2, 3, & 4) and agency's eligibility criteria.
 - b. **Assessment:** individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered emergency shelter services, as needed, available, and appropriate.
 - c. **Prioritization/Diversion/Referral:** when appropriate based on the individual's needs and wishes, the provision of or referral to Coordinated Intake, offered through the Continuum of Care that can quickly assist individuals to maintain or obtain safe, permanent housing, shall be prioritized over the provision of Emergency Shelter services.
 - d. **Reassessment:** program participants will be reassessed as case management progresses, based on the individual service provider's policies.
 - e. **Discharge/Length of Stay:** sub-recipients shall make every effort to ensure program participants are discharged from Emergency Shelter services only when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.
 - f. **Safety and Shelter Safeguards for Special Populations:** shelter programs must create policies and procedures that provide a safe environment for shelter guests and staff; policies and procedures may vary depending on the shelter population being served.

These policies and procedures must be explained to applicants prior to moving into the shelter. In addition, they must be posted in the shelter and on the agency's website.

- g. Supportive services are available to assist persons in obtaining housing either on-site or through a day-time resource center. All shelter residents are notified of the availability of support services and how to access the services.
- h. Shelter is available every day of the year. In the instances where it is necessary to temporarily close a shelter for rehabilitation or major maintenance work, as much notice as possible should be provided to guests, and efforts should be made to find a short-term replacement facility.
- i. Shelter guests will be treated by staff and volunteers with respect and dignity and will receive a welcoming, safe and non-intimidating environment.
- j. Each shelter will have a policy of respect for each individual's self-identified gender. Guests who request shelter services will be admitted to the shelter operated for the gender to which an individual identifies themselves. Transgender and transsexual guests will be offered the same services and resources as all other guests as long as resident safety can be maintained. While shelter staff will take reasonable steps to accommodate specific needs, it may not be possible to segregate the individual from the rest of the shelter population. Staff will not share or in any way advertise the fact that certain guests may have identified themselves transgendered/ transsexual.
- k. All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marital status identifying as a family at a family shelter must be served as a family. Families at family shelters must not be separated when entering shelter. There can be no inquiry, documentation requirement or "proof" related to family status, gender identification and/ or sexual orientation. The prohibition on inquiries or documentation does not prohibit inquiries related to an individual's sex for the limited purpose of determining placement in temporary, emergency shelters that are limited to one sex because they have shared bedrooms or bathrooms, or for determining the number of bedrooms to which a household may be entitled. The age and/or gender of a child under 18 must not be used as a basis for denying any family's admission to a program that uses ESG or THP funding or services if those programs serve families with children under age 18.
- l. There is no charge to a shelter guest for emergency shelter.
- m. Documentation (including Photo ID, birth certificate, etc.) is not a barrier to shelter. Identification may be requested when safety is a factor.
- n. Guests may be asked to leave for a period of time in the event of serious infraction and only in the most severe cases such as for behavior that is deemed seriously threatening or harmful to other guests and staff. Banning a shelter guest is allowed only when all other options have been explored and a ban is necessary to protect the health and safety of staff and guests. All shelter guests will be notified of the agency's grievance policy. When it is

not possible to serve a guest because of the guest's behavior, efforts will be made by shelter staff to assist the guest in finding alternatives.

3. TRANSITIONAL HOUSING MINIMUM STANDARDS

Minimum standards for transitional housing programs funded through ESG shall be the same as transitional housing programs funded under the CoC. *Only people who qualify as "homeless" based on Category 1, 2, or 4* of the "homeless" definition found at 24 CFR 576.2 are eligible for transitional housing assistance.* * See Exhibit A and Exhibit D. **Transitional Housing (TH) facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering TH. Programs will provide safe, affordable housing that meets participants' needs.**

Eligibility Criteria

- a. Participants must meet categories 1 - Literally Homeless, 2 - At Imminent Risk, or 4 - Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- b. By 2017, all TH program participants must fall into at least one of the categories below:
 1. individuals or head of household struggling with a substance use disorder
 2. individuals in early recovery from a substance use disorder who may desire more intensive support to achieve their recovery goals
 3. survivors of domestic violence or other forms of severe trauma who may require and prefer the security and onsite services provided in a congregate setting to other available housing options
 4. unaccompanied and pregnant or parenting youth (age 16-24) who are unable to live independently (i.e. emancipated minors) or who prefer a congregate setting with access to a broad array of wraparound services to other available housing options. Individuals listed on a sex offender registry
 5. people re-entering the community after a stay in jail or prison
 6. Large families (6 or more people)

Minimum Standards

1. Maximum length of stay cannot exceed 24 months.
2. Assistance in transitioning to permanent housing must be provided. A VI-SPDAT must be completed within 30 days of program entry, and the household name referred to the housing priority list, if not done already.
3. Intensive support services must be provided through the duration of stay in transitional housing.

4. Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.
5. Case management staff must have skills and experience to meet the unique needs of the population served.

Minimum Performance Benchmarks for TH Projects

1. 80% or more of all participants will exit to a permanent housing situation
2. 63% or more of all participants will have mainstream (non-cash) benefits at exit from program
3. 54% or more of adult participants will increase income from all sources

HOMELESS PREVENTION AND RAPID RE-HOUSING MINIMUM STANDARDS

1. ELIGIBILITY/PRIORITIZATION

a. Rapid Re-housing (RRH):

Rapid rehousing is an intervention designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve stability in that housing. Rapid rehousing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are typically tailored to the unique needs of the household. The core components of a rapid re-housing program are housing identification and relocation, short-and/or medium term rental assistance and move-in (financial) assistance, and case management and housing stabilization services.

Program staff are expected to remain engaged with the households from first contact to program exit (no more than 24 months of rental assistance, in addition to up to 6 months of continued case management), using a progressive engagement approach and tailoring services to the needs of the household in order to assist the household to maintain permanent housing. (24 CFR 578.37 and Core Components of Rapid Re-Housing, National Alliance to End Homelessness) According to the National Alliance to End Homelessness, progressive engagement is “a strategy of providing a small amount of assistance to everyone entering the homelessness system. For most households, a small amount of assistance is enough to stabilize, but for those who need more, more assistance is provided. This this flexible, individualized approach maximizes resources by only providing the most assistance to the households who truly need it. This approach is supported by rese CoC that household characteristics such as income, employment, substance use, etc., cannot predict what level of assistance a household will need.”

To be eligible for RRH Housing Relocation and Stabilization Services and short-term and medium- term rental assistance, people must:

1. Meet the federal criteria under paragraph (1) of the “homeless” definition in 24 CFR 576.2; OR
2. Meet the criteria under paragraph (4) of the “homeless” definition in 24 CFR 576.2, and live in an emergency shelter or other place described in paragraph 91) of the “homeless” definition. Homeless verification must be maintained in the file.
3. The participant must be assessed using the VI-SPDAT or VI-F-SPDAT at a Coordinated Entry Access point. A copy of the assessment shall be retained in the participant’s file.
4. Participants must lack sufficient resources and support networks necessary to retain housing without rapid rehousing assistance (24 CFR 578.37(E)).
5. Participants will be prioritized based on VI-SPDAT score and length of time homeless. Youth ages 18-21 will be prioritized.

Minimum Standards

1. The maximum length of program participation is 24 months.
2. Supportive services designed to meet the needs of the project participants must be made available to the project participant throughout the duration of stay in the RRH project.
3. Project participants in RRH must enter into a written lease agreement that is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month, except on prior notice by either party. Programs may have additional requirements determined by program funding requirements. For example, programs may require a written lease agreement for an initial term of one year.
4. RRH programs may provide move-in costs.
5. RRH project will use Housing First approaches, following the Minimum Standards listed in the Housing First section of the Written Standards.
6. Financial assistance and case management should be based on a household’s individual needs using progressive engagement. Assistance should be offered using a light touch; start with a small amount of assistance and increase it if needed.
7. RRH programs will connect households with community resources and mainstream benefits to allow for individual resources to be used for housing costs.

Access to Rapid Re-housing

1. All referrals for RRH projects will come through the coordinated entry system and the RRH priority lists for families and individuals.

2. All CoC funded ESG recipients will serve all populations of people. Assistance will not be limited to a specific population i.e., domestic violence, youth, veterans etc.

Minimum Performance Benchmarks for RRH Projects

1. Average length of shelter stay is less than 45 days.
2. Average time from program entry to housing placement is 60 days.
3. Referral to RRH Priority List within 7 days of emergency shelter entry or assessment for families and individuals living on the streets or in a place not meant for human habitation.
4. 80% of participants will remain in permanent housing -at the end of the operating year or exiting to permanent housing during the operating year
5. 80% of adult participants will maintain or increase their total income -at the end of the operating year or program exit.

b. Homelessness Prevention (HP):

To be eligible for HP Housing Relocation and Stabilization Services and short-term and medium- term rental assistance, people must require HP services to prevent moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2, have an annual income below 30% of the median income for the area, and:

1. Meet the federal criteria under the “at risk of homelessness” definition in 24 CFR 576.2;

OR

2. Meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR 576.2
3. Have a Court Ordered Eviction notice
4. The participant’s household annual income must be at or below 30% AMI.

2. PARTICIPANT CONTRIBUTION

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or rapid re-housing assistance are:

- a. Participant’s income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant’s income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant’s

file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.

- b. Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants.

3. RENTAL ASSISTANCE DURATION AND ADJUSTMENT

Minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time are:

- a. Participants received approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each month of financial assistance received. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- b. Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.

4. SERVICE TYPE, AMOUNT & DURATION

Minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services provided to a program participant, including maximum amount of assistance, maximum number of months the program participant may receive assistance, or the maximum number of times the program participant may receive assistance, are:

- a. Financial Assistance:
 1. Use with other subsidies: Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
 2. Rental application fees: Payments shall only be made for fees charged by the owner to all applicants.
 3. Security deposits: Payments shall not exceed two (2) month's rent.
 4. Last month's rent: Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total rental assistance.

5. Utility deposits: Payments shall only be made for gas, electric, water and sewage deposits.
6. Utility payments: Payments shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service;
 - a. A partial payment counts as 1 month;
 - b. Payment shall only be made if the utility account is in the name of the participant or a member of the same household;
 - c. Payment shall only be made for gas, electric, water and sewage costs;
 - d. Participants shall not receive more than 24 months of utility assistance within any 3-year period.
7. Moving costs: Payments shall only be made for temporary storage fees accrued after the date the participant begins receiving housing relocation and stabilization services and prior to the date that the participant moves into permanent housing. Payment shall not be made for storage fees in arrears.

b. Housing Relocation and Stabilization Services:

1. Housing and placement services: Payment shall only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:
 - a. Assessment of housing barriers needs and preferences
 - b. Development of an action plan for locating housing
 - c. Housing search
 - d. Outreach to and negotiation with owners
 - e. Assistance with submitting rental applications and understanding leases
 - f. Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness
 - g. Assistance with obtaining utilities and making moving arrangements
 - h. Tenant counseling

Payment for housing search and placement services shall not exceed 24 months during any 3-year period.

2. Housing stability case management: Payment shall only be made for assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or

to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:

- a. Using centralized or coordinated assessment system
- b. Conducting the initial evaluation, including verifying and documenting participant eligibility
- c. Counseling
- d. Developing, securing and coordinating services and obtaining Federal, State and local benefits
- e. Monitoring and evaluating participant progress
- f. Providing information and referral to other providers
- g. Developing an individualized housing and service plan
- h. Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days.

Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

3. Mediation: Payment shall only be made for the cost of mediation between the participant and the owner or person with whom the participant is living, if it is necessary to prevent the participant from losing the permanent housing where he/she resides. Payment for mediation services shall not exceed 24 months during any 3-year period.
4. Legal services: Payment shall only be made for the cost of legal services, if they are necessary to resolve a legal problem that prohibits the participant for obtaining permanent housing or will likely result in the participant losing the permanent housing where he/she resides. Payment for legal services shall not exceed 24 months during any 3-year period.
5. Credit repair: Payment shall only be made for the cost of assisting the participant in obtaining skills related to household budgeting, managing money, accessing a free personal credit report and resolving personal credit problems. Payment will not be made for a debt or modification of a debt. Payment for credit repair services shall not exceed 24 months during any 3-year period.

c. Rental Assistance

1. Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based housing.
2. Payment for short-term rental assistance shall not exceed 3 months

3. Payment for medium-term rental assistance shall be for more than 3 months but shall not exceed 24 months.
4. Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees.
5. Except for a one-time payment of rental arrears on the participant's portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance or to a participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
6. Payment shall not exceed the Fair Market Rent established by HUD (24 CFR 888) and shall comply with HUD's standards of rent reasonableness (24 CFR) 982.507).
7. Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet or late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
8. Payment for rent shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the provider with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period, and late payment penalty requirement as the participant's lease.
9. Payment of any late payment penalties incurred by the provider shall not be claimed for reimbursement by ESG.
10. Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears.
11. Payment shall only be made once the participant has been deemed eligible for assistance.
12. Payments shall not be made until required re-certifications has been completed and all documentation of continued eligibility is received. For HP clients, the 4th, 7th, 10th, etc. month of payment cannot be processed until re-certification of client eligibility is confirmed. For RRH clients, the 13th month of payment cannot be processed until re-certification of client eligibility is confirmed.

d. Tenant-Based Rental Assistance

The rental assistance agreement with the unit owner shall be terminated without further payment if:

1. The participant moves out of the unit
2. The lease terminates and is not renewed

3. The participant becomes ineligible to receive ESG rental assistance
- e. Project-Based Rental Assistance

Payment shall only be made under the following conditions:

1. The lease has an initial term of one year
2. The rental assistance agreement covers one or more permanent housing units in the same building
3. Each unit covered by the agreement is only occupied by participants
4. Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month.

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

5. RE-EVALUATIONS

Minimum standards for completing eligibility re-evaluations of individuals and families are:

- a. Timing:
 1. Homelessness Prevention: Participants shall be re-evaluated not less than one every three months. The next month's rental payment shall not be paid until completion of the re- certification process.
 2. Rapid Re-housing: Participants shall be re-evaluated not less than one annually. The next month's rental payment shall not be paid until completion of the re- certification process
- b. Eligibility
 1. The participant shall have an annual income that is 30 percent of area median income for the area or less, as determined by HUD; and
 2. The participant shall continue to lack sufficient resources and support networks necessary to retain housing without ESG assistance.

COCONTINUUM OF CARE-WRITTEN STANDARDS MINIMUM REQUIREMENTS

1. OVERVIEW

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) enacted into law on May 20, 2009 consolidated three of the separate homeless assistance programs administered by the U.S. Department of Housing and Urban Development (HUD) under the McKinney-Vento Homeless Assistance Act into a single grant program. The HEARTH Act also codified into law the Continuum of Care (CoC) Planning Process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs. The interim regulation was published in the Federal Register on July 31, 2012 and became effective August 30, 2013.

The purpose of the CoC program is to promote communitywide commitment to the goal of ending homelessness; providing funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

The CoC programs include transitional housing, permanent supportive housing for disabled persons, permanent housing, supportive services, and HMIS. A CoC is a geographically based group of representatives that carries out the planning responsibilities of the CoC program, as set for the in 24 CFR part 578. These representatives come from organizations that provide services to the homeless or represent the interests of the homeless or formerly homeless. The three major duties of a CoC are to (1) operate the CoC; (2) designate an HMIS for the CoC; and (3) develop a plan for the CoC. The CoC is the homeless planning group that oversees the CoC process for the 8 rural counties in NE TN.

24 CFR 576.7(9) requires in consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance and 24 CFR 578.7 (5) Consulting with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of Emergency Solutions Grants program recipients and sub-recipients. Each CoC recipient must also establish and follow local written standards for providing assistance, which at a minimum must include the CoC's Standards defined below.

2. PROGRAM COMPONENTS AND ELIGIBLE ACTIVITIES

CoC funds may be used for projects under Six program components: Permanent housing (PH), Permanent Supportive Housing for Disabled Persons (PSH), Rapid Re-Housing (RRH), Transitional Housing (TH), Supportive services Only (SSO), and HMIS. Eligible costs include: CoC planning activities, Unified Funding Agency costs, acquisition, rehabilitation, new construction, leasing, rental assistance, supportive services, operating costs, HMIS, project administrative costs, relocation costs, and indirect costs. Projects funded in the CoC consist of

permanent and transitional housing programs. The following Standards will summarize COC's minimum requirements for providing housing and services to PH, PSH, RRH, and TH clients.

TRANSITIONAL HOUSING MINIMUM STANDARDS

The COC developed the following Transitional Housing (TH) minimum standards to ensure:

- Program accountability to individuals and families experiencing homelessness;
- Program compliance with HUD regulations;
- Program uniformity;
- Adequate program staff competence and training, specific to target population served

Recipients must include the following minimal standards when developing and implementing local programs.

1. CLIENT INTAKE PROCESS

Minimum standards for evaluating individual and family eligibility for assistance under a Transitional Housing program not to exceed 24 months shall include the following: (Note: The program shall ensure active client participation and informed consent).

Eligibility Criteria

- a. Description of how program participants will be screened via the community's Coordinated Intake and Referral System, and/or a description of how referrals will be accepted from the Coordinated Intake and Referral System, which will ensure that, and placement priority will be determined through the use of the VI-SPDAT. *See Exhibit E clients who are most vulnerable will be given priority access to available programs.
- b. All adult program participants must meet the following program eligibility requirements:
 1. 18 years of age or older
 2. Qualify as "homeless" based on paragraphs (1, 2, or 4) of the homeless definition
*See Exhibit A
 3. If applicable, how adult household members are able to participate in developing and carrying out an appropriate participation plan.
- c. **Additional program eligibility requirements:** The COC prefers that only the following additional requirements be included in the standards for evaluating a household's eligibility for assistance; however, acknowledges that existing grantees may have other criteria. Written standards must include all eligibility requirements and the reasoning behind the decision to include them if other than the following:
 1. Chronically homeless

2. Residency requirements
 3. Other program-specific requirements (i.e. limiting program entry to a specific subpopulation of individuals or families experiencing homelessness)
- d. A description of all reasons that programs may disqualify an individual or family from program entry. (The COC encourages providers to disqualify only for the following reasons):
1. Household make-up provided it does not violate HUD's Fair Housing, Equal Opportunity, and Equal Access to Housing in HUD Program requirements (Singles Only programs can disqualify households with children, Families Only programs can disqualify single households, etc.)
 2. Criminal record that includes violent crimes within the last three years
 3. Status as a lifetime registered sex offender.
 4. A Conviction of Methamphetamine Manufacture
- e. The COC encourages providers to design programs so that agencies don't disqualify an individual or family from program entry for lack of income or employment status.
- f. Programs cannot disqualify an individual or family because of evictions or poor rental history.
- g. The program explains the services that are available and the requirements for participation and secures a commitment from each adult household member to participate in program services prior to admitting the individual or family into the program.
- h. The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants have copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.

2. HOUSING CRITERIA

Minimum standards for accessing housing are:

- a. The program shall provide safe, affordable housing that meets participant's needs in accordance with client intake practices and within HUD guidelines for transitional housing programs.
- b. In providing or arranging for housing, the program shall consider the needs of the individual or family experiencing homelessness.
- c. The program provides assistance in accessing suitable housing.
- d. The program may provide assistance with moving costs.

- e. The program ensures that there are executed occupancy agreements or leases (or subleases) with all program participants residing in housing.
 - 1. The lease agreement with the participant is for a term of at least one month and ends in 24 months and cannot be extended
- f. The program shall not charge minimum rent.
- g. If the program imposes occupancy charges, the charges may not exceed the highest of:
 - 1. 30% of the household's monthly adjusted gross income; or
 - 2. 10% of the household's monthly income; or
 - 3. If the household receives payment for welfare assistance from a public agency and a part of the payment is specifically designated by the agency to meet the household's housing costs, the occupancy charge cannot be higher than the portion that has been designated for housing costs.

When determining rental costs, agencies cannot round up to the nearest dollar.

3. CASE MANAGEMENT SERVICES

Minimum standards for case management shall include:

- a. Criteria (Required)
 - 1. How individual case management is provided to program participants on a regular and consistent basis as determined by the individual's case plan. Case management shall include the following:
 - a. Assessing, planning, coordinating, implementing and evaluating the overall service delivered to the participant.
 - b. Helping participants learn to live in housing, maintain their housing in a safe manner, and work with the landlord.
 - c. Helping participants create support systems and participate in community as they desire.
 - 2. Individualized budgeting and money management services are provided to program participants as needed.
- b. Criteria (other eligible services to encourage self-sufficiency) If applicable, written standards shall include descriptions of how the Provider will assist clients to achieve the following criteria to ensure COC performance measures are met:

1. Job preparation and attainment, such as career counseling, job preparation training, dress and grooming, job placement, and job retention. (Part of CoC performance measures)
2. Assistance in accessing mainstream benefits, including food stamps, child care assistance, and health insurance. (Part of CoC performance measures)
3. Educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education. (Part of CoC performance measures)
4. Basic life skills information, including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security cards, birth certificate, etc.)
5. Assistance with food, clothing and/or transportation.
6. Interpersonal skill building, such as developing positive relationships with others, parenting skills, effective communication, decision-making, conflict resolution, and stress management.
7. The program may require program participants to take part in supportive services provided through the program as a condition of continued participation, as long as the services are not disability-related (e.g. mental health, outpatient health services)
8. The program can only require disability-related services if the participant's housing stability is in jeopardy.

Only projects whose primary purpose is to provide substance abuse treatment services may require program participants to take part in substance abuse treatment services as a condition of continued program participation.

4. SERVICE COORDINATION

Minimum standards for service coordination are:

- a. The program shall coordinate with community agencies and individuals for the provision of those services needed and requested by the individual or family, but that are not directly provided by the programs.
 1. Arrangements shall be made as appropriate with community agencies and individuals for the provision of medical services, mental health services, legal services, and other assistance requested by the participant, which are not provided directly by the program.

5. TERMINATION OF ASSISTANCE

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

At a minimum, standards for termination of assistance are:

- a. If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected.
- b. The program may terminate services when the following occurs:
 1. A participant engages in violent or aggressive behavior toward others, including program staff.
 2. A participant uses illegal drugs in their unit.
 3. A participant engages in criminal activity in their unit.
- c. In cases when a participant is terminated from services for other than the above stated reasons, the burden is on the Program to provide evidence that it considered extenuating circumstances and made significant attempts to help the participant continue in the program before deciding to terminate assistance.
- d. The program follows a written termination process and has a process for appeals/grievances. This information is provided to participants at the beginning of the program, and if/when termination of services occurs.

6. FOLLOW UP SERVICES

Minimum standards for continuity of services to all participants following exit from the program shall be as follows:

- a. The program shall include exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
- b. The program shall attempt to follow up with phone or written contact at least once every 30 days for the first three months after the client exits the program, to determine if there is any need for further services, to offer assistance in obtaining those services, and to evaluate the services that were provided.
- c. Supportive services may be provided to participants after their exit from the program.

7. CLIENT FILES/RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow COC and HUD to determine whether program requirements are being met and comply with HUD regulations. Documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

- a. The file maintained on each participant should, at a minimum, include information required by HUD, homelessness eligibility in the preferred order as required by HUD (third-party, intake observation, self-certification), participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, discharge paperwork, HMIS service transactions, and any follow-up and evaluation data that is compiled.
- b. Client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual and implemented in the COC Performance Standards. At a minimum, programs must record the date the client enters and exits the program and update the client's information as changes occur.
- c. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate, except to project staff and other agencies as required by law. Participants must give informed consent to release any personal identifying information (PII) data to be utilized for rese CoC, teaching and public interpretation.
- d. All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by scanning, photocopying, or similar methods may be substituted for the original records.
- e. Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants. Records pertaining to other funding sources must adhere to those record retention requirements.

8. EVALUATION AND PLANNING

Minimum standards shall include program planning and evaluation procedures as follows:

- a. The program shall have written goals and objectives for its housing and services that are consistent with CoC goals and objectives, and includes any commitments made to participants and the local community.

- b. The program shall include a review of the case management, housing, and follow-up needs of participants served by the program and the existing services that are available to meet these needs, on at least an annual basis.
- c. The program shall include a process where the agency will review and revise, as appropriate, goals, objectives and activities based upon the data generated through the review of participant's needs, existing services, and the follow-up evaluations on at least an annual basis.
- d. The program shall include a process for conducting on-going evaluations of its services to participants.
- e. The program shall exhibit due regard for the participant's privacy in conducting and reporting its evaluation.
- f. The program's planning and/or evaluation process shall be open to paid and volunteer staff, program participants, the agency's Board of Directors, if applicable.

PERMANENT (SUPPORTIVE) HOUSING MINIMUM STANDARDS

Permanent Supportive Housing (PSH) for persons with disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist persons experiencing homelessness with a disability or families with an adult or child member with a disability achieve housing stability.

The CoC has shown that permanent supportive housing is the most intensive and effective solution for people experiencing homelessness. It is not a one-size-fits-all approach and should only be offered to those households that truly need that level of support. Unless there is a systematic way to prioritize households with the highest needs, the most vulnerable homeless, including the chronically homeless, are often not the population who receives this type of assistance.

HUD published the following Prioritization Notice in July 2014 which established a suggested order of priority for households served in permanent supportive housing programs, and provides uniform recordkeeping requirements to document the chronically homeless status of program participants. The intent of the Notice is to move CoC's and recipients of CoC Program funding for PSH in a direction where chronically homeless persons, including chronically homeless unaccompanied youth or unaccompanied youth with the highest needs, are prioritized for assistance above other eligible households. The COC encourages all PSH grantees to incorporate the process described in the Notice. The Notice can be found under the following link:

NOTICE CPD-16-011: PRIORITIZING PERSONS EXPERIENCING CHRONIC HOMELESSNESS IN PERMANENT SUPPORTIVE HOUSING AND RECORDKEEPING REQUIREMENTS FOR DOCUMENTING CHRONIC HOMELESS STATUS

The COC has developed the following Permanent (Supportive) Housing (PH/PSH) minimum standards to ensure:

- a. Program accountability to individuals and families experiencing homelessness;
- b. Program compliance with HUD regulations;
- c. Program uniformity; and
- d. Adequate program staff competence and training, specific to target population served

Although the COC strongly encourages PSH providers to adopt recommendations provided in the Notice above, at a minimum the following written standards must be included when developing and implementing local programs.

1. CLIENT INTAKE PROCESS

Minimum standards for evaluating individual and family eligibility for assistance under a Permanent Housing/Permanent Supportive Housing Program (long term housing for 24+ months) shall include the following: (Note: The program shall ensure active client participation and informed consent)

Eligibility Criteria

- a. Description of how program participants will be screened via the community's Coordinated Entry System, and/or a description of how referrals will be accepted from the Coordinated Entry agency which will ensure that clients who are most vulnerable will be given priority access to available programs.
- b. All adult program participants must meet the following program eligibility requirements:
 - 1. At least one adult or child in the household has a disabling condition.
 - 2. Household must meet the HUD definition of homelessness.
 - 3. CoC funded programs must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement.
 - 4. Programs may not establish additional eligibility requirements beyond those specified here and those required by funders
- c. **Additional program eligibility requirements:** The COC prefers that only the following additional requirements be included in the standards for evaluating a household's eligibility for assistance; however acknowledges that existing grantees may have other criteria. Written standards must include all eligibility requirements and the reasoning behind the decision to include them if other than the following:
 - 1. Chronically homeless
 - 2. Residency requirements

3. Other program-specific requirements (i.e. limiting program entry to a specific subpopulation of individuals or families experiencing homelessness)
- d. A description of all reasons that programs may disqualify an individual or family from program entry. (The COC encourages providers to disqualify only for the following reasons):
 1. Household make-up provided it does not violate HUD's Fair Housing, Equal Opportunity, and Equal Access to Housing in HUD Program requirements (Singles Only programs can disqualify households with children, Families Only programs can disqualify single households, etc.)
 2. Criminal record that includes violent crimes within the last three years.
 3. Status as a lifetime registered sex offender.
- e. The COC encourages providers to design programs so that agencies don't disqualify an individual or family from program entry for lack of income, criminal history, domestic violence, or employment status.
- f. Programs cannot disqualify an individual or family because of evictions or poor rental history.
- g. The program explains the services that are available and the requirements for participation and secures a commitment from each adult household member to participate in program services prior to admitting the individual or family into the program.
- h. The program maintains a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants have copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.

Participant Prioritization Requirements

Participants will be prioritized for eligibility based on their chronic homeless status, length of time homeless, and VI-SPDAT or VI-F-SPDAT score.

First Priority - Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- a. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and

- b. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Second Priority - Chronically Homeless Individuals and Families with the Longest History of Homelessness.

A chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which both of the following are true:

- a. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
- b. The CoC or CoC program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Third Priority - Chronically Homeless Individuals and Families with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- a. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year;
- b. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Fourth Priority - All Other Chronically Homeless Individuals and Families.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- a. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year
- b. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Access to PSH Projects

All referrals for PSH projects will come through the Coordinated Entry System and the CoC-wide PSH priority lists for families and individuals.

Minimum Performance Benchmarks for PSH Projects

- a. 80% or more of participants remain stable in PSH for at least one year or exit to a different permanent housing situation
- b. 20% or more of adult participants will have income from sources other than employment
- c. 54% or more of adult participants will increase income for sources other than employment
- d. 75% or more of all participants will have mainstream benefits at exit from the project
- e. 20% or more of adult participants will have employment income

2. HOUSING CRITERIA

Minimum standards for accessing housing are:

- a. There can be no predetermined length of stay for a PSH project.
- b. Supportive services designed to meet the needs of the project participants must be made available to the project participant throughout the duration of stay in the PSH project.
- c. Project participants in PSH must enter into a lease agreement that is terminable for cause for an initial term of at least one year. The lease must be automatically renewable upon expiration for a minimum term of one month, except on prior notice by either party.
- d. Turnover beds in PSH projects will be prioritized for chronically homeless participants.
- e. PSH project will use the Housing First Approach.
- f. The program shall provide safe, affordable housing that meets participant's needs in accordance with client intake practices and within HUD guidelines for permanent (supportive) housing programs.
- g. In providing or arranging for housing, the program shall consider the needs of the individual or family experiencing homelessness.
- h. The program provides assistance in accessing suitable housing and meets housing standards set forth in 24 CFR 576.75.
- i. The program may provide assistance with moving costs.

- j. The program signs occupancy agreements or leases (or subleases) with all program participants residing in housing.
- k. The program ensures that there are executed occupancy agreements or leases (or subleases) with all program participants residing in housing.
- l. The lease agreement with the participant is for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month.
- m. The program shall not charge minimum rent.
- n. If the program imposes occupancy charges, the charges may not exceed the highest of:
 - i. 30% of the household's monthly adjusted gross income;
 - ii. 10% of the household's monthly income; or
 - iii. If the household is receiving payment for welfare assistance from a public agency and a part of the payment is specifically designated by the agency to meet the household's housing costs, the portion paid by the program participant cannot exceed the amount that has been designated for housing costs.
 - iv. When determining rental costs, agencies cannot round up to the nearest dollar.

3. CASE MANAGEMENT SERVICES

Minimum standards for case management shall include:

- a. Criteria
 - 1. Individual case management plans which are provided to program participants on a regular and consistent basis as determined by the individual's case plan. Case management plans shall include the following:
 - a. Assessing, planning, coordinating, implementing and evaluating the overall service delivered to the participant.
 - b. Helping participants learn to live in housing, maintain their housing in a safe manner, and work with the landlord.
 - c. Helping participants create support systems and participate in community as they desire.
 - 2. Individualized budgeting and money management services provided to program participants as needed.
 - 3. Job preparation and attainment, such as career counseling, job preparation training, dress and grooming, job placement, and job maintained. (Part of COC performance measures).

4. Assistance in accessing mainstream benefits, including food stamps, child care assistance, and health insurance. (Part of COC performance measures)
5. Educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education. (Part of COC performance measures)
6. Basic life skills information, including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security cards, birth certificate, etc.).
7. Assistance with food, clothing and/or transportation.
8. Interpersonal skill building, such as developing positive relationships with others, parenting skills, effective communication, decision-making, conflict resolution, and stress management.
9. The program may require program participants to take part in supportive services provided through the program as a condition of continued participation, as long as the services are not disability-related (e.g. mental health, outpatient health services)
10. The program can only require disability-related services if the participant's housing stability is in jeopardy.

Only projects whose primary purpose is to provide substance abuse treatment services may require program participants to take part in substance abuse treatment services as a condition of continued program participation.

4. SERVICE COORDINATION

Minimum standards for service coordination are:

- a. The program shall coordinate with community agencies and individuals for the provision of those services needed and requested by the individual or family, but that are not directly provided by the programs.
- b. Arrangements shall be made as appropriate with community agencies and individuals for the provision of medical services, mental health services, legal services, and other assistance requested by the participant, which are not provided directly by the program.

5. TERMINATION OF ASSISTANCE

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

At a minimum, standards for termination of assistance are:

- a. If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected.
- b. The program may terminate services when the following occurs:
 1. A participant engages in violent or aggressive behavior toward others, including program staff.
 2. A participant uses illegal drugs in their unit.
 3. A participant engages in criminal activity in their unit.
- c. In cases when a participant is terminated from services for other than the above stated reasons, the burden is on the Program to provide evidence that it considered extenuating circumstances and made significant attempts to help the participant continue in the program before deciding to terminate assistance.
- d. The program follows a written termination process and has a process for appeals/grievances. This information is provided to participants at the beginning of the program, and if/when termination of services occurs.

6. FOLLOW UP SERVICES

Minimum standards for continuity of services to all participants following exit from the program shall be as follows:

- a. The program shall include exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
- b. The program shall attempt to follow up with phone or written contact at least once every 30 days for the first three months after the client exits the program, to determine if there is any need for further services, to offer assistance in obtaining those services, and to evaluate the services that were provided.
- c. Supportive services may be provided to participants after their exit from the program.

7. CLIENT FILES/RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow the COC and HUD to determine whether program requirements are being met and comply with HUD regulations. Documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

- a. The file maintained on each participant should, at a minimum, include information required by HUD, homelessness eligibility in the preferred order as required by HUD (third-party, intake

observation, self-certification), participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, discharge paperwork, HMIS service transactions, and any follow-up and evaluation data that is compiled.

- b. Client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual and implemented in the COC Performance Standards. At a minimum, programs must record the date the client enters and exits the program and update the client's information as changes occur.
- c. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate, except to project staff and other agencies as required by law. Participants must give informed consent to release any personal identifying information (PII) data to be utilized for reseCoC, teaching and public interpretation.
- d. All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.
- e. Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants. Records pertaining to other funding sources must adhere to those record retention requirements.

8. EVALUATION AND PLANNING

Minimum standards shall include program planning and evaluation procedures as follows:

- a. The program shall have written goals and objectives for its housing and services that are consistent with COC goals and objectives, and includes any commitments made to participants and the local community.
- b. The program shall include a review of the case management, housing, and follow-up needs of participants served by the program and the existing services that are available to meet these needs, on at least an annual basis.
- c. The program shall include a process where the agency will review and revise, as appropriate, goals, objectives and activities based upon the data generated through the review of participant's needs, existing services, and the follow-up evaluations on at least an annual basis.
- d. The program shall include a process for conducting on-going evaluations of its services to participants.
- e. The program shall exhibit due regard for the participant's privacy in conducting and reporting its evaluation.

- f. The program’s planning process shall be open to paid and volunteer staff, program participants, the agency’s Board of Directors, if applicable, and members of the COC Steering & Ranking Committee.

9. HOUSING FIRST APPROACH

The most successful model for housing people who experience chronic homelessness is permanent supportive housing using a “Housing First” approach, which is a client-driven strategy that provides immediate access to housing without requiring participation in psychiatric treatment, treatment for sobriety, or other service participation requirements. After settling into housing, clients are offered a wide range of supportive services that focus primarily on helping them maintain their housing. The COC strongly encourages recipients of PH/PSH funding to implement a Housing First approach. Grantees that implement a Housing First approach must ensure written standards include the following core components:

- a. **Few to no programmatic prerequisites to permanent housing entry.**

People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the program. People are also not required to first enter a transitional housing program in order to enter permanent housing.

- b. **Low barrier admission policies**

Permanent supportive housing’s admissions policies are designed to “screen-in” rather than “screen-out” applicants with the greatest barriers to housing, such as having no or very low income, poor rental history and past evictions, or criminal histories. Housing programs may have tenant selection policies that prioritize people who have been homeless the longest or who have the highest service needs as evidenced by vulnerability assessment or the high utilization of crisis services.

- c. **Rapid and streamlined entry into housing**

Many people experiencing chronic homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. In order to ameliorate this, Housing First permanent supportive housing models make efforts to help people experiencing homelessness move into permanent housing as quickly as possible, streamlining application and approval processes, and reducing wait times.

- d. **Supportive services that are voluntary but can and should be used to persistently engage tenants to ensure housing stability.**

Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-

judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.

e. **Tenants have full rights, responsibilities, and legal protections.**

The ultimate goal of the Housing First approach is to help people experiencing homelessness achieve long-term housing stability in permanent housing. Permanent housing is defined as housing where tenants have leases that confer the full rights, responsibilities, and legal protections under Federal, state and local housing laws. Tenants are educated about their lease terms, given access to legal assistance, and encouraged to exercise their full legal rights and responsibilities. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants' apartments without tenant's knowledge and permission except under legally-defined emergency circumstances, or as required applicable housing programs (e.g. HOME and Low-Income Housing Tax Credit programs requires 24-hour notice to conduct inspections for health and safety). Many Housing First permanent supportive housing programs also have a tenant association or council to review program policies and provide feedback, and formal processes for tenants to submit suggestion or grievances.

f. **Practices and policies to prevention lease violations and evictions are in place.**

Housing First supportive housing programs should incorporate practices and policies that prevent lease violations and evictions among tenants. For instance, program policies consistent with a Housing First approach do not consider alcohol or drug use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with illegal activity (e.g. selling illegal substances.) Housing First models may also have policies that give tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant's income. For example, rather than moving towards eviction proceedings due to missed rent payments, programs may allow tenants to enter into payment installment plans for rent arrearages or offer money management assistance to tenants.

g. **Is applicable in a variety of housing models.**

The Housing First approach can be implemented in different types of permanent supportive housing settings, including scattered-site models in private market apartments, where rental assistance is provided, and tenants have access mobile and site-based supportive services; single-site models in which permanent supportive housing buildings are newly constructed or rehabilitated and tenants have access to voluntary on-site services; and set-asides, where supportive services are offered to participants in designated units within affordable housing developments.

RRH is a short- to medium-term housing intervention designed to help individuals and families quickly exit homelessness, return to housing in the community (usually in the private market), and not experience homelessness again. RRH is a Housing First intervention, meaning that the primary focus is on moving households into housing quickly, without preconditions (such as those relating to employment, income, criminal records, "motivation," or sobriety).

Participating programs are expected to maximize the number of households served by accepting all referrals received through the CoC's Coordinated Entry System and by not screening out households. Additionally, the primary focus of assessments and assistance should be on resolving the participant's current housing crisis. This means a focus on the circumstances of the crisis, the household's barriers to obtaining and maintaining housing, and the reasons they are unable to solve their housing crisis without RRH assistance. RRH resources and services must be tailored to the unique needs of the household.

RAPID RE-HOUSING PROGRAMS (RRH)

1. THE CORE COMPONENTS OF THE COC RRH

- a. housing identification,
- b. rental and move-in assistance, and
- c. Case management services.
- d. While an RRH program must have all three of these services available, it is not required that a single entity provide all three services nor that do a household utilize them all. All participation in services should be voluntary and driven by the household.
- e. Program staff must be trained in the principles of Housing First approaches and oriented to the basic program philosophy of RRH. Under no circumstances should participation in services be a condition of occupancy. In other words, an RRH program may not terminate a participant solely for refusing to participate in supportive services. It is permissible, however, to require participation in general, low-demand case management with a primary goal of engagement and consistency with Housing First. While having such a requirement is allowable, failure to meet with the case manager must not lead to an automatic eviction or termination from the RRH program.

2. SCREEN-IN PROCESS

RRH programs must have well-defined and written "screen-in" processes that use consistent and transparent decision criteria.

- a. Eligibility criteria for the program must not include a period of sobriety, a commitment to participation in treatment or other services, or any other criteria designed to "predict" long-term housing stability, other than a willingness to work on a self-directed housing plan.
- b. Priority should be given to households that are the least likely to exit homelessness without assistance—not to the households considered most likely to succeed in RRH, regardless of participants' scores on assessment tools or current income.

- c. Disabilities should be assessed only in regard to their role in causing past housing instability or loss and when related to the household's ability to obtain a disability-specific benefit, service, or accessible unit.
- d. Programs must participate in the Homeless Management Information System (HMIS), collecting all required data and taking steps to achieve quality data entry. Victim services providers must not enter client-level data into HMIS; instead, they must use a comparable database to collect client-level data over time and generate unduplicated, aggregate reports based on that data.
- e. Programs must participate in and accept all referrals from CoC Coordinated Entry and must participate in efforts to improve the efficiency and quality of referrals when necessary.
- f. Programs must maintain and distribute information on alternative, available resources for clients who wish to access other services in addition to those offered by program.
- g. Programs must have an ongoing performance improvement process that includes evaluations of household outcomes and household feedback.
- h. Rapid Re-Housing providers at a minimum must follow the following guidelines when developing and implementing local programs.

3. PARTICIPANT ELIGIBILITY AND INTAKE PROCESS

To receive CoC rapid re-housing (CoC-RRH) assistance, though, individuals and families may be defined as homeless under any of the four categories included in the Homeless Definition Final Rule as found below and the recipient agency must adhere to the following:

The client must be:

- a. Literally homeless (Category 1).
- b. Imminently losing their primary night-time residence (Category 2).
- c. Unaccompanied youth under 25 years of age or families with children and youth who do not otherwise qualify as homeless under this definition but who are defined as homeless under another Federal statute and meet additional specified criteria (Category 3). Note: For CoC-RRH assistance to be provided to persons defined as homeless under Category 3, the project must be located within the geographic area of a CoC that has received HUD approval to serve this population.
- d. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (Category 4).
- e. The CoC Program Notice of Funding Availability (NOFA) may impose additional eligibility requirements not reflected in the regulation. Projects funded to carry out RRH

- assistance under the CoC program must follow both CoC Program NOFA and regulatory requirements.
- f. Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.
 - g. There shall be no minimum or maximum income limits for either CoC-funded RRH projects when determining the initial eligibility of a household.
 - h. While interim evaluations must be completed more frequently, annual re-evaluations are required by HUD for participants in CoC funded RRH projects. To remain eligible, households must have income at or below 30 percent of the Area Median Income (AMI) at annual re-evaluation.
 - i. Minimum standards for evaluating individual and family eligibility for assistance under a Rapid Re-housing Program (short-term up to 3 months and/or medium-term for 3 to 24 months) shall include the following:

A description of all reasons that programs may disqualify an individual or family from program entry. (The COC encourages providers to disqualify only for the following reasons):

- a. Household make-up, provided it does not violate HUD's Fair Housing, Equal Opportunity, and Equal Access to Housing in HUD Program requirements (Singles Only programs can disqualify households with children, Families Only programs can disqualify single households, etc.)
- c. Criminal record that includes violent crimes within the last three years.
- d. Status as a lifetime registered sex offender.
- e. Programs cannot disqualify an individual or family because of no income, domestic violence status, evictions, or poor rental history.

The grantee must

- f. Explain the services that are available and the requirements for participation and secures a commitment from each adult household member to participate in program services prior to admitting the individual or family into the program.
- g. Maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants have copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.
- h. Maintain records documenting acceptable evidence of participants' homeless status. Acceptable evidence generally includes third-party written verification of the participant's stay in an unsheltered location, in an emergency shelter, or in another eligible location. These records must comply with HUD's recordkeeping requirements. If that documentation is not attainable, only then can third-party oral verification be used

as documentation, and only after case workers have documented their due diligence in attempting to obtain third-party written verification. Self-certification of homeless status is permitted only when neither third-party written nor third-party oral verification can be obtained, and due diligence has been documented.

4. PRIORITIZING RAPID REHOUSING

The Appalachian Regional Coalition on Homelessness CoC will utilize the Vulnerability index –Service Prioritization and Decision Assessment Tool (VI–SPDAT) for Single Adults and Families, American Version 2.0 developed by Org Code Consulting, Inc. to determine severity of needs, vulnerability, and need for a housing intervention. This will allow for the ARCH Coordinated Entry to have a coordinated assessment approach and promote a uniform decision-making process. Individuals who receive a score between 4 and 7 on the VI–SPDAT for Single Adults, American Version 2.0, will be prioritized to receive rapid re-housing resources. Families who receive a score between 4 and 8 on the VI–SPDAT for Families, American Version 2.0, will be prioritized to receive rapid re-housing resources.

- a. Individuals and Families will be prioritized based on their VI-SPDAT score as it measures the severity of needs, vulnerability, and need for housing intervention. The higher the score, the higher the severity of needs, vulnerability, and need for housing intervention. Meaning that an individual who receives a VI-SPDAT score of 7 will be prioritized over an individual who received a VI-SPDAT score of 5. In the event that two or more individuals and/or families receive the same score from the VI-SPDAT, individuals and families will be prioritized utilizing the established priority.
- b. Order of Priority for Rapid Re-housing Programs
 1. First Priority–Homeless Individuals and Families as defined by Category 1 and Category 4, with a member in the household who has a disabling condition with the longest history of homelessness and with the most severe service needs.
 2. Second Priority–Homeless individuals and families as defined by Category 1 and Category 4, with the longest history of homelessness and with the most severe service needs.
 3. Third Priority–Homeless individuals and families as defined by Category 1 and 4, with a member in the household who has a disabling condition (who is not the head of household) with a long period of continuous or episodic homelessness.
 4. Fourth Priority–Homeless individuals and families as defined by Category 1 and Category 4, with the longest history of homelessness
 5. Fifth Priority–Homeless individuals and families as defined by Category 1 and Category 4, with the most severe service needs.

6. Sixth Priority–All other homeless individuals and families as defined by Category 1 and Category 4.

5. RRH PERFORMANCE BENCHMARKS

All RRH providers should meet or exceed project quality goals established by HUD and CoC guidelines which include the following:

- a. At least 80 percent of project participants either remained stable in permanent housing or exited to a different permanent housing situation.
- b. At least 20 percent or more of project participants will have employment income.
- c. At least 20 percent will have or obtain income from sources other than employment such as SSI and/or SSDI, for those who are not employable.
- d. At least 54 percent of project participants increased their income from sources other than employment in a given operating year;
- e. At least 75 percent of project participants obtained mainstream benefits; and
- f. 100 percent of the project participants came from the street or other locations not meant for human habitation, emergency shelters, or safe havens.
- g. RR providers must reduce the length of homelessness and rapidly re-house participants into stable housing within 30 days of receipt of referral.

6. MINIMUM STANDARDS

The following minimum standards will be applied to all rapid re-housing projects:

- a. Maximum participation in a rapid re-housing program cannot exceed 24 months in any three year period.
- b. Supportive services must be offered throughout the duration of stay in housing.
- c. Participants are required to meet with a Housing Stabilization Specialist not less than once per month to assist the participant in ensuring long-term housing stability.
- d. Participants will be evaluated every 3 months to determine if further assistance is needed. All documents required at entry will be required at re-evaluation.
- e. Participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- f. Must re-evaluate every three months that the participant lacks sufficient resources and support networks necessary to retain housing without assistance.

- g. Rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent established by HUD and complies with HUD's standard of rent reasonableness.
- h. If Participants are to pay rent, it is required that the tenant share not exceed 30% of the household's adjusted monthly gross income.
- i. Follow-up will occur at six months after discharge.
- j. Grantees must keep records for all participants that outline the services provided, including:
 - 1. Evidence that, at a minimum, quarterly assessments of service needs were completed
 - 2. When a participant is terminated from the program, evidence that all applicable federal requirements were followed.

7. HOUSING CRITERIA

Minimum standards for accessing housing are:

- a. There can be no pre-determined length of stay for a RRH project.
- b. Supportive services are designed to meet the needs of the project participants and must be made available to the project participant throughout the duration of stay in the RRH project.
- c. Project participants in RRH must enter into a lease agreement that is terminable for cause for an initial term of at least one year. The lease must be automatically renewable upon expiration for a minimum term of one month, except on prior notice by either party.
- d. Turnover beds in RRH projects will be prioritized for chronically homeless participants.
- e. RRH project will use the Housing First Approach.
- f. The program shall provide safe, affordable housing that meets participant's needs in accordance with client intake practices and within HUD guidelines for permanent (supportive) housing programs.
- g. In providing or arranging for housing, the program shall consider the needs of the individual or family experiencing homelessness.
- h. The program provides assistance in accessing suitable housing and meets housing standards set forth in 24 CFR 578.51.
- i. The program may provide assistance with moving costs.

- j. The program signs occupancy agreements or leases (or subleases) with all program participants residing in housing.
- k. The program ensures that there are executed occupancy agreements or leases (or subleases) with all program participants residing in housing.
- l. The lease agreement with the participant is for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month.
- m. The program shall not charge minimum rent.

8. CASE MANAGEMENT SERVICES

Minimum standards for case management shall include:

- a. Individual case management plans which are provided to program participants on a regular and consistent basis as determined by the individual's case plan. Case management plans shall include the following:
 - 1. Assessing, planning, coordinating, implementing and evaluating the overall service delivered to the participant.
 - 2. Helping participants learn to live in housing, maintain their housing in a safe manner, and work with the landlord.
 - 3. Helping participants create support systems and participate in community as they desire.
 - 4. Individualized budgeting and money management services provided to program participants as needed.
 - 5. Job preparation and attainment, such as career counseling, job preparation training, dress and grooming, job placement, and job maintained. (Part of COC performance measures).
 - 6. Assistance in accessing mainstream benefits, including food stamps, child care assistance, and health insurance. (Part of COC performance measures)
 - 7. Educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education. (Part of COC performance measures)
 - 8. Basic life skills information, including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security cards, birth certificate, etc.).
 - 9. Assistance with food, clothing and/or transportation.

10. Interpersonal skill building, such as developing positive relationships with others, parenting skills, effective communication, decision-making, conflict resolution, and stress management.
11. The program may require program participants to take part in supportive services provided through the program as a condition of continued participation, as long as the services are not disability-related (e.g. mental health, outpatient health services)
12. The program can only require disability-related services if the participant's housing stability is in jeopardy.
13. Only projects whose primary purpose is to provide substance abuse treatment services may require program participants to take part in substance abuse treatment services as a condition of continued program participation.

9. SERVICE COORDINATION

Minimum standards for service coordination are:

- a. The program shall coordinate with community agencies and individuals for the provision of those services needed and requested by the individual or family, but that are not directly provided by the program.
- b. Arrangements shall be made as appropriate with community agencies and individuals for the provision of medical services, mental health services, legal services, and other assistance requested by the participant, which are not provided directly by the program.

10. TERMINATION OF ASSISTANCE

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

At a minimum, standards for termination of assistance are:

- a. If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected.
- b. The program may terminate services when the following occurs:
 1. A participant engages in violent or aggressive behavior toward others, including program staff.
 2. A participant uses illegal drugs in their unit.

3. A participant engages in criminal activity in their unit.
- c. In cases when a participant is terminated from services for other than the above stated reasons, the burden is on the Program to provide evidence that it considered extenuating circumstances and made significant attempts to help the participant continue in the program before deciding to terminate assistance.
- d. The program follows a written termination process and has a process for appeals/grievances. This information is provided to participants at the beginning of the program, and if/when termination of services occurs.

11. FOLLOW UP SERVICES

Minimum standards for continuity of services to all participants following exit from the program shall be as follows:

- a. The program shall include exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
- b. The program shall attempt to follow up with phone or written contact at least once every 30 days for the first three months after the client exits the program, to determine if there is any need for further services, to offer assistance in obtaining those services, and to evaluate the services that were provided.
- c. Supportive services may be provided to participants after their exit from the program.

12. CLIENT FILES/RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow the COC and HUD to determine whether program requirements are being met and comply with HUD regulations. Documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

- a. The file maintained on each participant should, at a minimum, include information required by HUD, homelessness eligibility in the preferred order as required by HUD (third-party, intake observation, self-certification), participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, discharge paperwork, HMIS service transactions, and any follow-up and evaluation data that is compiled.
- b. Client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual and implemented in the COC Performance Standards. At a minimum, programs must record the date the client enters and exits the program and update the client's information as changes occur.

- c. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate, except to project staff and other agencies as required by law. Participants must give informed consent to release any personal identifying information.
- d. All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.
- e. Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants. Records pertaining to other funding sources must adhere to those record retention requirements.

13. EVALUATION AND PLANNING

Minimum standards shall include program planning and evaluation procedures as follows:

- a. The program shall have written goals and objectives for its housing and services that are consistent with COC goals and objectives, and includes any commitments made to participants and the local community.
- b. The program shall include a review of the case management, housing, and follow-up needs of participants served by the program and the existing services that are available to meet these needs, on at least an annual basis.
- c. The program shall include a process where the agency will review and revise, as appropriate, goals, objectives and activities based upon the data generated through the review of participant's needs, existing services, and the follow-up evaluations on at least an annual basis.
- d. The program shall include a process for conducting on-going evaluations of its services to participants.
- e. The program shall exhibit due regard for the participant's privacy in conducting and reporting its evaluation.
- f. The program's planning process shall be open to paid and volunteer staff, program participants, the agency's Board of Directors, if applicable, and members of the COC Steering & Ranking Committee.

14. ELIGIBLE COST SUMMARY/STRUCTURING FINANCIAL ASSISTANCE

- a. CoC program funds may be used to pay indirect costs in accordance with 24 CFR 200, as applicable. Indirect costs may be allocated to each budget line item noted below, in accordance with cost eligibility guidelines, so long as that allocation is consistent with an indirect cost rate proposal developed and approved in accordance with OMB Circulars A-87 or A-122, or 24 CFR 200, as applicable.
- b. Only the eligible costs submitted on the CoC application budget and /or amendment request are allowable. If an eligible cost was not included when the budget and/or amendment was submitted, a request to include the cost must be submitted to CSB per the local HUD field office.
- c. Eligible costs may include the following:
 1. Rental Assistance
 2. Security Deposits
 3. Supportive Services
 4. Child Care
 5. Education Services
 6. Employment Assistance and Training
 7. Food
 8. Housing Search and Counseling Services
 9. Legal Services
 10. Life Skills Training
 11. Mental Health Services
 12. Outpatient Health Services
 13. Outreach Services
 14. Substance Abuse Services
 15. Transportation
 16. Utility Deposits/Utilities
 17. Direct Provision of Services
 18. Leasing

It is recommended that programs structure the amount and duration of financial assistance using a Housing First approach and providing financial assistance in a flexible, individualized, and progressive manner as described below. This will achieve the strongest outcomes for participants and serve the maximum number of households.

15. LEAD-BASED PAINT

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the lead-based remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead- Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and

implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R.. Refer to ESG Program Policies and Procedures Manual and ESG Program Guidelines for further guidance.

16. SAFETY, SANITATION & PRIVACY

Minimum standards for all shelters and program participant-occupied housing consist of compliance with safety, sanitation and privacy requirements identified in 24 CFR 576.403. Refer to the ESG Program’s Policies and Procedures Manual, and ESG Program Guidelines for detail instructions.

- a. Additional requirements for permanent housing: Providers shall not use ESG funding to help someone remain or move into housing if the housing does not meet minimum habitability standards. For new move-ins, inspections must occur prior to execution of a landlord/provider agreement and landlord/tenant lease. If a program participant is expected to eventually access subsidized housing, such as the Section 8 Housing Voucher Program, the provider should make certain the housing unit meets any additional health and safety requirements of that program.

17. CONFLICTS OF INTEREST

Minimum standards for conflicts of interest are: Conflicts of Interest: Sub-recipients must keep records to show compliance with the conflicts-of-interest requirements in 24CFR 579.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements of 24 CFR 576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions. Sub-recipient Conflict of Interest policies must also include instructions to agency staff that may be in the situation of needing assistance themselves, or providing assistance to close friends or family members, to ensure that ESG funds are not used inappropriately.

- a. Organizational conflict of interest:
 1. RRH assistance will not be contingent on the individual’s or family’s acceptance or occupancy of emergency shelter or housing owned by the provider or a provider’s subsidiary or parent.
 2. No provider, with respect to individuals or families occupying housing owned by the provider or a provider’s subsidiary or parent, will carry out the initial evaluation.
- b. Individual conflicts of interest:
 1. When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 85.36.
- c. All transactions/activities:

1. Conflicts prohibited – No persons involved with the RRH program or who is in a position to participate in a decision-making process or gain inside information regarding the program activities, shall obtain a financial interest or benefit from an assisted activity; or have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity’s proceeds (either himself or herself or those with whom he or she has family or business ties) during his or her tenure or for one year following tenure.
2. Persons covered – These conflict of interest provisions applies to any employee, agent, consultant, officer or elected or appointed official of the provider’s agency.

18. PROGRAM INCOME

Minimum standards for program income earned during the project period are that program income shall be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income shall be retained.

19. HOUSING FIRST APPROACH

“Housing First” is a client-driven strategy the provides immediate access to housing without requiring participation in psychiatric treatment, treatment for sobriety, or other service participation requirements. After settling into housing, clients are offered a wide range of supportive services that focus primarily on helping them maintain their housing. The COC strongly encourages recipients of PH/RRH funding to implement a Housing First approach. Grantees that implement a Housing First approach must ensure written standards include the following core components:

a. **Few to no programmatic prerequisites to permanent housing entry.**

People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the program. People are also not required to first enter a transitional housing program in order to enter permanent housing.

b. **Low barrier admission policies**

Permanent supportive housing’s admissions policies are designed to “screen-in” rather than “screen-out” applicants with the greatest barriers to housing, such as having no or very low income, poor rental history and past evictions, or criminal histories. Housing programs may have tenant selection policies that prioritize people who have been homeless the longest or who have the highest service needs as evidenced by vulnerability assessment or the high utilization of crisis services.

c. **Rapid and streamlined entry into housing**

Many people experiencing chronic homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. In order to ameliorate this, Housing First permanent supportive housing models make efforts to help people experiencing homelessness move into permanent housing as quickly as possible, streamlining application and approval processes, and reducing wait times.

d. **Supportive services that are voluntary but can, and should, be used to persistently engage tenants to ensure housing stability.**

Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.

e. **Tenants have full rights, responsibilities, and legal protections.**

The ultimate goal of the Housing First approach is to help people experiencing homelessness achieve long-term housing stability in permanent housing. Permanent housing is defined as housing where tenants have leases that confer the full rights, responsibilities, and legal protections under Federal, state and local housing laws. Tenants are educated about their lease terms, given access to legal assistance, and encouraged to exercise their full legal rights and responsibilities. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants' apartments without tenant's knowledge and permission except under legally-defined emergency circumstances, or as required applicable housing programs (e.g. HOME and Low-Income Housing Tax Credit programs requires 24 hour notice to conduct inspections for health and safety). Many Housing First permanent supportive housing programs also have a tenant association or council to review program policies and provide feedback, and formal processes for tenants to submit suggestion or grievances.

f. **Practices and policies to prevention lease violations and evictions are in place.**

Housing First supportive housing programs should incorporate practices and policies that Prevent lease violations and evictions among tenants. For instance, program policies consistent with a Housing First approach do not consider alcohol or drug use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with illegal activity (e.g. selling illegal

substances.) Housing First models may also have policies that give tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant's income. For example, rather than moving towards eviction proceedings due to missed rent payments, programs may allow tenants to enter into payment installment plans for rent arrearages or offer money management assistance to tenants.

g. **Is applicable in a variety of housing models.**

The Housing First approach can be implemented in different types of permanent supportive housing settings, including scattered-site models in private market apartments, where rental assistance is provided, and tenants have access mobile and site- based supportive services; single-site models in which permanent supportive housing buildings are newly constructed or rehabilitated and tenants have access to voluntary on- site services; and set-asides, where supportive services are offered to participants in designated units within affordable housing developments.

DEFINITIONS

At-risk of Homelessness – An individual or family who has income below 30% of area median family income for the area, as defined by HUD, and who does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place described in the “homeless” definition (See Exhibit A and Exhibit B), and meets one if the following definitions defined under 24 CFR 578.3 (CoC program) or 24 CFR 576.2 (ESG program). May also include a child or youth who qualifies as homeless under other Federal programs.

HMIS – Community Management Information System (formerly the Homeless Management Information System) means the information system designated by the Continuum of Care to comply with the HMIS requirements prescribed by HUD.

HMIS Lead Agency – The entity designated by the Continuum of Care to operate the CW/HMIS on its behalf.

Chronically Homeless Individual - A “chronically homeless” individual is defined to mean a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the “chronically homeless” definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

Chronically homeless families - A “chronically homeless family” is defined as families with adult heads of household who meet the definition of a chronically homeless individual. If there is no adult in

the family, the family would still be considered chronically homeless if a minor head of household meets all the criteria of a chronically homeless individual. A chronically homeless family includes those whose composition has fluctuated while the head of household has been homeless.

CoC/Continuum of Care – A group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social services providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless or formerly homeless persons that are organized to plan for and provide a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

ESG – Emergency Solutions Grant Program (24 CFR part 576)

Developmental Disability – Defined in Section 102 of the Developmental Disability Assistance and Bill of Rights Act of 2000, and means a severe, chronic disability that is attributable to a mental or physical impairment or combination, and is manifested before age 22, and is likely to continue indefinitely. It must result in substantial limitations in 3 or more major life activities (self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, or economic self-sufficiency) AND reflects need for special services or individualized support, or other form of assistance this is lifelong or extended duration.

Disabling Condition – A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury, which is expected to be of long-continued and indefinite duration, substantially impedes the person’s ability to live independently, and is of such a nature that such ability could be improved with more suitable housing conditions; a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 200; or Acquired immunodeficiency Syndrome (AIDS) or any conditions arising from the etiologic agent for Acquired Immunodeficiency Syndrome, including infection with the Human Immunodeficiency Virus (HIV).

Emergency Shelter – Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

Fair Market Rent – Means the rents published in the Federal Register annually by HUD

Families – Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the followings: (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or (2) A group of persons residing together, and such group includes, but is not limited to (a) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family); (b) An elderly family; (c) A near-elderly family; (d) A disabled family; (e) A displaced family; and (f) The remaining member of a tenant family.

Homeless – There are 4 categories within the definition of homelessness, as defined under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act); the most common definition being an individual or family who lacks a fixed, regular, and adequate nighttime residence under Category 1. See Exhibit A

Homeless Prevention – A program targeted to individuals and families at risk of homelessness. Specifically, this includes those that meet the criteria under the “at risk of homelessness” definition at 576.2, as well as those who meet the criteria in Category 2, 3, and 4 of the “homeless definition and have an annual income below 30% of family median income for the area.

Housing First – An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

Permanent Housing – Community-based housing without a designated length of stay, and includes both Permanent Supportive Housing and Rapid Re-housing.

Permanent Supportive Housing – Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Physical, Mental or Emotional Impairment – Expected to be long-continuing or of indefinite duration; substantially impedes the person’s ability to live independently and could be improved by more suitable housing.

Rapid Re-housing – Housing relocation and stabilization services and short- or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Assistance may be provided for up to 24 months during any 3-year period and may include rental arrear for up to six months, to eligible persons who qualify as homeless under Category 1 and 4 of the “homeless” definition. See Exhibit A and Exhibit C

Recipient – An applicant that signs a grant agreement with HUD.

Rent Reasonableness – A process conducted by the recipient or sub-recipient to determine if the rent charge for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charge by for comparable unassisted units.

Safe Haven – For the purpose of defining chronically homeless, supportive housing that means the following: (1) serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services; (2) provides 24-hour residence for eligible persons for an unspecified period; (3) has an overnight capacity limited to 25 or fewer persons; and (4) provides low-demand services and referrals for the residents.

Street Outreach – The act of reaching out to unsheltered homeless people; connecting them with emergency shelter, housing or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Sub-recipient – A private nonprofit organization, State, local government, or instrumentality of State or local government that receives a sub-grant from the recipient to carry out a project.

Transitional Housing – Facilitates the movement of homeless individuals and families to permanent housing within 24 months

Unsheltered Homeless – Individuals and families who qualify as homeless under Category 1(i) of the “homeless” definition. See Exhibit A

Victim Service Provider – A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

EXHIBIT A: HUD DEFINITION FOR HOMELESS

HUD CRITERIA FOR DEFINING HOMELESSNESS

<p>Category 1 Literally Homeless</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately operating shelter designated to provide temporary living arrangements (including congregate shelters; transitional housing; and hotels and motels paid for by charitable organization or by federal, state, and local government programs); <u>or</u> <p>Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</p>
<p>Category 2 Imminent Risk of Homelessness</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provide that:</p> <ul style="list-style-type: none"> • Residence will be lost within 14 days of the data application for homeless assistance; • No subsequent residence has been identified; <u>and</u> <p>The individual or family lacks the resources or support networks needed to obtain other permanent housing</p>
<p>Category 3 Homeless under other Federal Statutes</p>	<p>Unaccompanied youth under 24 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under the other listed federal statutes; • Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; • Have experienced persistent instability as measured by two moves or more during the preceding 60 days; <u>and</u>; • Can be expected to continue in such status for an extended period of time due to special needs or barriers <p><i>Note: CoC projects may serve unaccompanied youth and families with children under this category only if the CoC applies to HUD Field Office to serve such populations, and HUD approves the request. If approved, no more than 10% of the total amount of funds awarded to all recipients within the CoC may be used to serve Category 3 population.</i></p>
<p>Category 4 Fleeing/Attempting to Flee DV</p>	<p>Any individual or family who:</p> <ul style="list-style-type: none"> • Is fleeing, or is attempting to flee, domestic violence; • Has no other residence; <u>and</u> <p>Lacks the resources or support networks to obtain other permanent housing</p>

EXHIBIT B: HUD DEFINITION FOR AT RISK OF HOMELESSNESS

<p>Emergency Shelter</p>	<p>Individuals and families defined as “homeless” under the following categories are eligible for assistance in ES projects:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless • Category 2: Imminent Risk of Homelessness • Category 3: Homeless Under Other Federal Statutes <p>Category 4: Fleeing/Attempting to Flee DV</p>
<p>Rapid Re-Housing</p>	<p>Individuals and families defined as “homeless” under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless • Category 4: Fleeing/Attempting to Flee DV (if the individual or family is also literally homeless) <p><i>Note: Clients assisted through CoC-RRH programs, which are funded through the CoC, are eligible to receive assistance if the individual or family meet the definition of homeless under all four Categories. <u>(Not currently available through the COC)</u></i></p>
<p>Homeless Prevention</p>	<p>Individuals and families defined as “homeless” under the following categories are eligible for assistance in HP projects:</p> <ul style="list-style-type: none"> • Category 2: Imminent Risk of Homelessness • Category 3: Homeless Under Other Federal Statutes <p>Category 4: Fleeing/Attempting to Flee DV (if the individual or family is NOT also literally homeless)</p>

EXHIBIT D: RECORDKEEPING REQUIREMENTS

<p>Category 1 Literally Homeless</p>	<ul style="list-style-type: none"> • Written observation by the outreach worker; <u>or</u> • Written referral by another housing or service provider; <u>or</u> • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; • For individuals exiting an institution-one of the forms of evidence above <u>and</u>: <ul style="list-style-type: none"> ○ Discharge paperwork <u>or</u> written/oral referral, <u>or</u> ○ Written record of intake worker’s due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution
<p>Category 2 Imminent Risk of Homelessness</p>	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave: or • For individual and families leaving a hotel or motel-evidence that they lack the financial resources to stay; or • A documented and verified oral statement; and • Certification that no subsequent residence has been identified; and • Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
<p>Category 3 Homeless under other Federal Statutes</p>	<ul style="list-style-type: none"> • Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and • Certification of no PH in last 60 days; and • Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and • Documentation of special needs or 2 or more barriers.
<p>Category 4 Fleeing/Attempting to Flee DV</p>	<ul style="list-style-type: none"> • For victim service providers: <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • For non-victim service providers: <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and ○ Certification by the individual or head of household that no subsequent residence has been identified; and ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

EXHIBIT E: VULNERABILITY INDEX TOOL (VI-SPDAT / VI-F-SPDAT)

The Vulnerability Index Tool allows homeless service providers to assess and prioritize the universe of people who are homeless in a community and identify whom to treat first based on acuity of their needs. It is a brief survey that service providers, outreach workers, and even volunteers can use to determine an acuity score for each homeless person who participates. The scores can then be used to identify and prioritize candidates for different housing interventions based upon their acuity. Using the VI-SPDAT, providers can move beyond only assisting those who present at their particular agency and begin to work together to prioritize all homeless people in the community, regardless of where they are assessed, in a consistent and transparent manner.

To help with the solution of addressing and ending chronic homelessness in the 8 county service region, (COC) has implemented the VI-SPDAT as part of the Coordinated Assessment and Referral System, to allow those with the highest vulnerability score to be referred to housing providers for housing vouchers. Case management is provided by homeless service providers located within each community.

The VI-SPDAT Manual for Single Person Households is located at:

<http://www.orgcode.com/wordpress/wp-content/uploads/2014/08/VI-SPDAT-Manual-2014-v1.pdf>

EXHIBIT F: ESG- ELIGIBILITY CRITERIA AND PRIORITIZATION TOOL FOR
HOMELESSNESS PREVENTION SYSTEM

Eligibility Requirements

All potential clients will be screened for the following:

Income – Only households with income below 30% of the Area Median Income are eligible for Homelessness Prevention services

PLUS

Trigger Crisis – An event has occurred which is expected to result in housing loss within 30 days due to one of the listed reasons (See Attachment A for qualifying trigger crisis)

PLUS

No resources or support network to prevent homelessness – No other options are possible for resolving this crisis. “But for this assistance” this household would become literally homeless-staying in a shelter, a car, or another place not meant for human habitation.

OR

Unaccompanied children and youth who qualify as homeless under another Federal statute – See “Runaway and Homeless Youth Act” definition. (See Attachment B for other definitions of homelessness)

OR

Families with children or youth who qualify as homeless under another Federal statute – See Runaway and Homeless Youth Act definition. (See attachment B for other definitions of homelessness)

PLUS

Score of at least 20 points – or 15-19 points with override sign-off (See attachment A for score sheet)

EXHIBIT G: DEFINITION OF CHRONICALLY HOMELESS

24 CFR §578.3 HUD Chronically Homeless Definition

(1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

(i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

(ii) Has been homeless and living as described in paragraph (1) (i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1) (i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Attachment B

Other Definitions of Homelessness

Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.)

Runaway and Homeless Youth is administered by the Family and Youth Services Bureau within the Administration for Children & Families (ACF) of the U.S. Department of Health and Human Services (HHS). Information about the Runaway and Homeless Youth program grantees is available online at: <http://www.acf.hhs.gov/programs/fysb/programs/runaway-homeless-youth>

Head Start Act (42 U.S.C. 9831 et seq.)

Head Start funding is administered by the Office of Head Start (OHS) within ACF/HHS. A listing of Head Start programs, centers, and grantees is available online at: <http://eclkc.ohs.acf.hhs.gov/hslc/HeadStartOffices>

Violence against Women Act of 1994; subtitle N (42 U.S.C. 14043e et seq.)

Violence against Women Act established the Office on Violence against Women (OVW) within the U.S. Department of Justice (DOJ). OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault, and stalking. Currently, OVW administers one formula grant program and eleven discretionary grant programs, all of which were established under VAWA and subsequent legislation. More information about OVW is available online at: <http://www.justice.gov/ovw>

Public Health Service Act; section 330 (42 U.S.C. 254b)

The Public Health Service Act authorizes the Health Center Program, which is administered by the Bureau of Primary Health Care within the Health Resources and Services Administration (HRSA) of HHS. Information about local Health Centers can be found online at: <http://www.bphc.hrsa.gov/index.html>

Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.)

Food and Nutrition Act of 2008 relates to the Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps. SNAP is administered by the U.S. Department of Agriculture (USDA). More information about SNAP can be found online at:

<http://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap>

Child Nutrition Act of 1966; section 17 (42 U.S.C. 1786)

Child Nutrition Act of 1966 authorized numerous programs related to school lunches and breakfasts and funds for meals for needy students. For more information about these programs, contact the local School District.

McKinney-Vento Act; subtitle B of title VII (42 U.S.C. 11431 et seq.)

McKinney-Vento Act authorized the McKinney-Vento Education for Homeless Children and Youths Program, which is administered via the Office of Elementary and Secondary Education within the U.S. Department of Education. More information about this program is available online at: <http://www2.ed.gov/programs/homeless/index.html>. Also contact the local School District's representative.

Attachment C

COC CONTINUUM OF CARE EMERGENCY SOLUTIONS GRANT PROGRAM PROGRAM PERFORMANCE EVALUATION TOOL

The following guidelines and program evaluation tool has been developed by the COC to determine if programs funded through the State ESG Program are meeting goals and objectives of the CoC.

Federal Performance Goals:

- Reduce lengths of homeless episodes
- Reduce new and return entries into homelessness
- Increase jobs and income

Background

The purpose of the HUD McKinney-Vento homeless assistance programs, as defined by the U.S. Department of Housing and Urban Development (HUD), is to reduce the incidence of homelessness in communities by assisting homeless individuals and families to quickly transition into permanent housing and self-sufficiency, and to assist eligible households who are at imminent risk of homelessness from becoming homeless. It is the expectation of HUD that programs funded through the McKinney-Vento homeless programs be evaluated annually to ensure goals and objectives set by the local CoC are met. In order to be consistent with 402(f) and 413(b) of the McKinney-Vento Act, ESG recipients must also consult with local CoC's in developing performance standards and evaluating outcomes of ESG-assisted projects; and CoC's must in turn analyze patterns of use of ESG funds and help evaluate outcomes for ESG-funded projects. The U.S. Department of Housing and Urban Development (HUD) requires that CoCs carefully evaluate and review all renewal projects and to develop a reallocation process for projects funded with CoC funds. Reallocating funds is an important tool used by CoCs to make strategic improvements to their homelessness system. Through reallocation, the CoC can create new projects that are aligned with HUD's goals, by eliminating projects that are underperforming or are more appropriately funded from other sources.

Reallocation is particularly important when new resources are not available.

Reallocation Policy

All renewal projects are reviewed by the Project Planning, Steering & Ranking Committee to determine how the project performed and determine if a project should be considered for reallocation. The CoC monitors all programs through review of quarterly reports and comprehensive assessment of agency capacity and ability to implement performance measure goals and objectives.

The recommendation for reallocation may be based on any one of the following HUD criteria and the overall score of the project evaluation:

- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- Audit finding(s) for which a response is overdue or unsatisfactory;
- History of inadequate financial management accounting practices;
- Evidence of untimely expenditures on prior award;
- History of other major capacity issues that have significantly impacted the operation of the project and its performance;
- Timeliness in reimbursing sub recipients for eligible costs. HUD will consider a project applicant as meeting this standard if it has drawn down grant funds at least once per month;
- History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes; or
- Programs did not consistently meet the CoC performance measures.
- Failure to follow the Housing First model with preconditions/barriers to entry

Involuntary and Voluntary Reallocations

Involuntary Reallocation

Involuntary Reallocations are primarily based on three criteria:

- Projects that have the lowest score in the evaluation process.
- Projects that have unspent funds in the most recent FY ending.
- Percentage of funds unspent and history of recaptured funds may be considered.
- Projects that fail to follow Housing First model.

Methodology

ACH has created goals to help its grantees, and ESG sub-recipients to meet certain objectives of HUD and the ESG programs. A program review process will be used to evaluate recipient performance with both federal, state, and CoC goals. Evaluations will be assessed at least annually, and the timing of the program achievements will work in conjunction with completion of the annual consolidated funding application (the NOFA) to HUD, and the Consolidated Annual Performance Report (CAPER) submitted on behalf of the State ESG program. The attached Program Performance Evaluation Report will be completed for each McKinney-Vento program funded within the COC. A continuum-wide report will also be completed for all programs funded within COC. These reports will act as a performance evaluation tool and will indicate program achievement in each of the performance standards outlined below.

Achievement of the established performance standard varies as defined by each standard. Points

are allocated for each standard ranging from zero to twenty-five points, depending on the Standard. Performance standards will be marked as either “achieved”, “not achieved” or “not applicable”. Overall program achievement will be assessed based on the percent of all performance standards achieved.

CoC-funded programs which meet less than half of the performance standards will be considered “programs of concern” and may be required to develop a 12-month action plan for improving program performance in the area(s) identified as “not achieved”. Programs of concern may be required to provide quarterly progress reports to COC’s Executive Director, who will assess the program performance at the end of the 12 month period and will determine if the program is improving in the areas identified and meeting federal and local goals. If the program performance has not improved significantly, as determined by COC’s Executive Director, then the program may be at risk for reallocation or program re-allocation during local HUD McKinney-Vento NOFA cycles (beginning with the 2018 NOFA).

State-ESG funded programs which meet less than half of the performance standards may also be considered “programs of concern”. It shall be the responsibility of the State’s ESG Program Manager to develop an action plan with the applicable sub-recipient, as defined under Section 8.0 of the ESG Program’s Policies and Procedures Manual, to ensure the goals and objectives of the ESG and the COCare met. The State’s ESG Program Manager will provide status reports to COC’s Executive Director at least annually.

Program Performance Evaluation Report

All data generated for the Program Performance Evaluation Report will be derived from the Homeless Management Information System (HMIS), the COC Recipient’s Annual Performance Report (APR), or ESG reports (CAPER) obtained from the sub-recipient or the State’s ESG Program Manager. The State’s ESG Program Manager will work with the HMIS Administrator to obtain the necessary data to generate the Program Performance Evaluation Report.

Reallocations or Re-allocation of CoC Funding

CoC funded programs which meet less than 75% of the performance standards will be considered “programs of concern” and will be required to submit a detailed corrective action plan for improving program performance in the area(s) identified as not achieved. Programs of concern will be evaluated by COC’s Executive Director and the COC Steering & Ranking Committee when it is time to consider local applications for possible funding, reallocation or re-allocation beginning with the 2018 HUD McKinney-Vento NOFA cycle. Funding reallocation or re-allocation will be determined and recommended by the COC Steering & Ranking Committee as part of the NOFA process. Appeals on the basis of fact may be requested about the decision of the Steering & Ranking Committee to reallocate program funding. An appeals review will be held, if necessary, and will be facilitated by the COC Governing Board. (If a member of the Board is also a recipient of CoC funding they will recuse themselves from the appeals process.)

The decision of the appeals review will be considered final. Funding reallocation would be contingent on HUD approval during the annual consolidated funding application process.

Program re-allocation will be recommended by the COC Steering & Ranking Committee. Program re-allocation will be recommended if a program is not performing up to the federal and local expectations and if there is an opportunity to improve performance and meet local and federal needs by changing the program model. Re-allocation would mean working with the program and the local HUD office to reclassify the program from one program model to another. For example, a transitional housing program could be converted, or repurposed, to become an emergency shelter program a permanent housing program, or a rapid re-housing program. The COC Steering & Ranking Committee would work closely with the program staff and the local HUD office on the re-allocation plan and the timeline for completion of the program re-allocation. Program re-allocation would be contingent on HUD approval during the annual consolidated funding application process.

**Attachment D
CARE Screening Form**



Entity ID: _____

In Intake Log: Yes / No

Walk in / Call in

"CARE" Initial Screening Form

Screener Name: _____ Date: _____

Name: _____

Date of Birth: _____ SSN: _____ Gender: _____

Citizenship Status: _____ Primary Language: _____ Race: _____ Ethnicity _____

Street Address: _____

City: _____ Apt #: _____ County: _____

State: _____ Zip Code: _____

Have you been in the GPD and if so how long? _____

Phone # (_____) _____ Alternate phone # (_____) _____

Email: _____

Have you been continuously homeless for at least one year? Yes / No

Prior to program entry, total number of months continuously homeless: _____

During the past 3 years, total number of times you have been homeless: _____

During the past 3 years, total number of months you have been homeless: _____

Current Housing Status: _____

Prior Residence Type: _____ Length of Stay: _____

Health Insurance Yes / No How would you consider your health? Excellent/Very Good/Good/Fair/Poor

Do you have a documented disability? Yes / No If yes, what type? _____

Is this documented disability expected to last for at least 12 months or until death? Yes / No

Have you applied for disability in the last 12 months with the Social Security Administration? Yes / No

(If No, fill out ARCH SOAR program Referral) Do you expect to apply for disability? Yes / No

HIV/AIDS: Yes / No HUD/VASH / Section 8 / GPD

Do you receive any non-cash benefits? Yes / No What are they? _____

Do you have an eviction notice, a court ordered eviction notice or a disconnect notice? Yes / No

Branch of Military: _____ Date entered: _____ Date exited: _____

Discharge Status: _____

Is everyone in the household able to walk up and down stairs? Yes / No

Is anyone in the household restricted from having contact with Minors? Yes / No

Have you been convicted of a crime against another person? Yes / No

INCOME:

Amount? _____ Source? _____
Amount? _____ Source? _____
Total Income: _____ Total Yearly Income: _____
50% AMI: _____ 30% AMI: _____

FAMILY: (do not list head of household)

Family member #1 Name: _____ Gender: Male / Female
SSN: _____ Date of Birth: _____ Race: _____
Relationship: _____ Veteran? Yes / No

Family member #2 Name: _____ Gender: Male / Female
SSN: _____ Date of Birth: _____ Race: _____
Relationship: _____ Veteran? Yes / No

Family member #3 Name: _____ Gender: Male / Female
SSN: _____ Date of Birth: _____ Race: _____
Relationship: _____ Veteran? Yes / No

Family member #4 Name: _____ Gender: Male / Female
SSN: _____ Date of Birth: _____ Race: _____
Relationship: _____ Veteran? Yes / No

Family member #5 Name: _____ Gender: Male / Female
SSN: _____ Date of Birth: _____ Race: _____
Relationship: _____ Veteran? Yes / No

Family member #6 Name: _____ Gender: Male / Female
SSN: _____ Date of Birth: _____ Race: _____
Relationship: _____ Veteran? Yes / No

Family member #7 Name: _____ Gender: Male / Female
SSN: _____ Date of Birth: _____ Race: _____
Relationship: _____ Veteran? Yes / No

Do you (and household) feel safe in your current living situation? Yes / No

If you are fleeing Domestic Violence, refer to the National Domestic Violence Crisis Line 1-800-799-SAFE (7233)

Is anyone in the household pregnant? Yes / No If yes, estimated due date: _____

If you have children, are they in school? Yes / No Name of School: _____

School District: _____

Information Release

I, _____ hereby authorize Appalachian Regional Coalition on Homelessness (ARCH) to disclose in good faith any information to any CoC provider regarding assisting me in obtaining services.

I will hold Appalachian Regional Coalition on Homelessness (ARCH) and any other person speaking on my behalf free of liability for the exchange of this information.

Sign Name: _____

Print Name: _____

Date: _____

Attachment E

Emergency Transfer Plan for Victims of Domestic Violence

Appalachian Regional Coalition on Homelessness CoC

Effective Date: August 24, 2018

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

The Appalachian Regional Coalition on Homelessness (ARCH) Continuum of Care (CoC) is concerned about the safety of the tenants of the housing programs within its geographic area that are funded by Continuum of Care (CoC) Grant funds and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), CoC-funded programs providing permanent housing or transitional housing, except safe havens, must allow tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability of a housing program to honor such a request for tenants currently receiving rental assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the housing provider has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy. The transfer agency is encouraged to utilize other referrals to other CoC projects if no other options are available in their program. Receiving agencies are required to provide placement if eligibility is met. Transfer agencies are only required to provide two appropriate options.

This plan identifies tenants who are eligible for an emergency transfer; the documentation needed to request an emergency transfer; confidentiality protections; and how an emergency transfer may occur. In addition, it provides guidance for tenants on safety and security. The plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the federal agency which ensures that ARCH and the CoC- and ESG-funded providers within its geographic area in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR Part 5, Subpart L is eligible for an emergency transfer, if:

- The tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit; or
- The tenant is a victim of a sexual assault, and the sexual assault occurred on the premises within the 90-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, a tenant must notify the housing program's administrator or manager and submit a written request for a transfer to that individual. The tenant's written request for an emergency transfer should include either:

1. A statement expressing why the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains in the same dwelling unit assisted under the housing provider's program; or
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-day period preceding the tenant's request for an emergency transfer.

The housing program may request additional documentation from a tenant in accordance with the documentation policies of HUD's regulations at 24 CFR part 5, subpart L.

Confidentiality

The housing program will keep confidential any information that the tenant submits in requesting an emergency transfer, unless the tenant gives the housing program written permission to release the information or disclosure of the information is required by law or in the course of an eviction or termination proceeding. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person or persons that committed the act or acts of domestic violence, dating violence, sexual assault, or stalking against the tenant.

Emergency Transfer Timing and Availability

The housing program cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. However, the housing program will act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to the availability and safety of a unit. If the housing program does not expect to have another unit available within a reasonable period of time, it will contact other housing programs in the area to determine whether they have an available unit. If a unit is available, the tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant is being transferred.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe. The tenant is encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for

assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Local organizations offering assistance to victims of domestic violence.

Advocates and Domestic Violence Shelters Serving ARCH CoC

Abuse Alternatives

423-652-9093 (Office)

423-764-ABUSE (2287)

423-652-9750 (TTY/Hearing Impaired)

Serving: Bristol, TN/VA, Washington County, VA and Upper Sullivan County, TN

CHIPS

423-743-0022 (Office)

423-388-8231 (hotline)

Serving: Carter, Greene, and Unicoi County TN

Johnson County Safe Haven

423-727-0202

423-727-1914 (Hotline)

Serving: NE TN

Safe House

1-844-578-7233 (Hotline)

Serving: NE TN

Shepherd's Inn

423-542-0180

Serving: NE TN

For ADDITIONAL INFORMATION: You may view a copy of HUD’s final VAWA rule at: <https://www.federalregister.gov/documents/2016/11/16/2016-25888/violence-against-women-reauthorization-act-of-2013-implementation-in-hud-housing-programs>. Additionally, ARCH or any other CoC or ESG funded housing provider must make a copy of HUD’s VAWA regulations available to you upon request. For questions regarding VAWA or to request a copy of the regulation, please contact Anne Cooper, Executive Director, Appalachian Regional Coalition on Homelessness, 2700 South Roan Street, 300 Johnson City TN 37601 (423) 928-2724.

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime’s Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Record of Changes to Written Standards

Version	Written Standards Change or Update	Date Approved by Board	Signature of Board Chair
Original	N/A	02/10/2015	
2	New Format	09/01/2016	
3	Added Equal Access	06/20/2017	
4	Added VAWA Final Rule /Emergency Transfer Plan for DV	09/14/2018	
5	Added 1.A iii Documenting Homeless status through C/E	09/14/2018	
5	Added CoC Rapid Re-Housing Minimum Standards	03/01/2019	
	Updated attachment E ARCH address change	04/01/2019	