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COC & ESG   
written standards

**Serving Central Sierra Continuum of Care (CA-526)**

*Amador, Calaveras, Mariposa, & Tuolumne Counties*

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# Introduction

This document outlines the requirements for HUD Continuum of Care (CoC) or Emergency Solutions Grant (ESG) funding recipients (“service providers”). In the Central Sierra Continuum of Care (CSCoC), CoC funding supports permanent supportive housing and rapid re-housing, while ESG funding supports emergency shelter, homeless prevention, and rapid re-housing. This document aggregates HUD guidance around these program types, as well as local requirements and priorities, to create a comprehensive guide to the rules and regulations attached to each of the ESG and CoC project types in the CSCoC.

Standards for the state of California’s one-time California Emergency Solutions and Housing (CESH), Homeless Emergency Aid Program (HEAP), and Homeless Housing, Assistance and Prevention Program (HHAP) funds can also be found in Appendix A, B, and C in order to guide the CSCoC distribution process in the case that the funds are not spent down, as well as to call out the local requirements and priority populations.

For information about CalWORKs’ Housing Support Program (HSP), APS, MHSA, Home Safe, or other CalWORKs funding, please contact your respective county’s agency:

* Amador: Amador County Social Services,
  + [https://www.amadorgov.org/services/social-  
    services](https://www.amadorgov.org/services/social-services)
* Calaveras: Calaveras County HHSA,
  + <https://hhsa.calaverasgov.us/Public-Assistance/Eligibility/CalWORKs>
* Mariposa: Mariposa County HHSA,
  + <https://www.mariposacounty.org/FAQ.aspx?TID=62>
* Tuolumne: Tuolumne County Department of Social Services,
  + <https://www.tuolumnecounty.ca.gov/294/CalWORKs>

Each service provider is required to have their own policies and procedures, which should be informed and supplemented by the CSCoC community-wide Written Standards. For more information about this document or for more information about how to meaningfully integrate the CSCoC Written Standards into your existing projects, please contact Denise Crawford from ATCAA at dcloward@atcaa.org.

# Definitions

Affirmative Marketing and Outreach

The CoC Program interim rule at 24 CFR § 578.93(c) requires recipients of CSCoC Program funds to affirmatively market their projects to eligible households regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of outreach, and maintain records of those marketing activities. Housing assisted by HUD and made available through the CSCoC shall also be made available to households without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR § 5.105(a)(2).

Coordinated Entry

The coordinated entry process is an approach to coordination and management of a crisis response system’s resources that allows for consistent decisions from available information, to efficiently and effectively connect households to interventions that will rapidly end their homelessness. The goal is to develop a fair, rapid, coordinated, evidence-based, and transparent homeless response system.

In the Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System, HUD indicated that although the regulatory term is “centralized and coordinated assessment system,” for policy reasons HUD and other federal partners refer to it as the “coordinated entry process”. This change emphasizes that the process is not just about assessment but also about facilitating entry into the crisis response system and exit into housing. This document uses the term “coordinated entry” throughout.

CoC

Within the context of homelessness, a Continuum of Care is, first and foremost, a fellowship of care providers who assist community members along a wide spectrum of needs and services from preventing homelessness to providing immediate or long-term shelter and continuing to job placement. The sharing of information and resources across this spectrum makes it possible for these various businesses, providers, and services to work more efficiently and effectively together. This promotes communitywide commitment to the goal of ending homelessness; provides 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; promotes access to and effect utilization of mainstream programs by homeless individuals and families; and optimizes self-sufficiency among individuals and families experiencing homelessness.

CSCoC

The Central Sierra Continuum of Care is the organization that has been created to organize the continuum of care and services within the four counties of Amador, Calaveras, Mariposa, and Tuolumne. By pooling resources across the CSCoC, we can leverage existing resources to achieve care and services for each household and avoid duplication of services. This group is committed to a unified plan toward ending homelessness across these four counties.

Eligibility

In the context of the coordinated entry process, determining eligibility is a project-level process governed by written standards as established in CFR § 576.400(e) and 24 CFR § 578.7(a)(9). Eligibility information is not used as part of prioritization and ranking. Projects may be legally permitted to limit eligibility through a federal statute which requires that assistance be utilized for a specific population via state or local permissions in instances where federal funding is not used, and federal civil rights laws are not violated.

Entry Point or HUB

Entry points are the places – either virtual or physical – where a household in need of assistance accesses the coordinated entry process. To ensure accessibility to households in need, CSCoC provides access to projects from multiple, convenient physical locations. Households may initiate a request for services in person through any of the designated HUB Stations or through additional housing community service providers.

Emergency Shelter

A facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless. Emergency shelter is a short-term intervention with ongoing assessment based on progress; ideally less than 30 days.

ESG

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The change in the program’s name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program’s focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

HMIS

A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless households and households at risk of homelessness. Each Continuum of Care is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

Home Safe

The Home Safe Program, created by Assembly Bill (AB) 1811 (Chapter 35, Statutes of 2018), is intended to support the safety and housing stability of individuals involved in Adult Protective Services (APS) by providing housing-related assistance using evidence-based practices for homeless assistance and prevention. Counties operating Home Safe programs utilize a range of strategies to support housing stability for APS clients, including short-term financial assistance, legal services, eviction prevention, heavy cleaning, and landlord mediation, among other services.

Household

The term “household” refers to and encompasses any configuration of a person or persons in need, whatever their age or number (adults, youth, or children; singles or couples, with or without children). At a minimum, a household can consist of one individual.

Housing First

Housing First is an approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements and in which rapid placement and stabilization in permanent housing are primary goals. The idea behind Housing First is to move those who need a home directly into one and then address the issues that led to the homelessness. These issues can range from poverty to mental illness to drug addiction to domestic violence. According to the [National Alliance to End Homelessness](http://www.endhomelessness.org/), social services to enhance individual and family wellbeing can often be more effective when people are in their own homes. According to the [National Alliance to End Homelessness](http://www.endhomelessness.org/), social services to enhance individual and family wellbeing can often be more effective when people are in their own homes.

Housing Stability Plan

Service providers must work collaboratively with each household to complete a Housing Stability Plan. Through filling out the Housing Stability Plan, each household participates in identifying realistic short-term and long-term goals that will ultimately result in independent, stable permanent housing. The Housing Stability Plan should be used to help guide which resources are made available to each household and at what intensity or on what timeline (e.g., someone with a short-term goal to achieve employment may receive intensive employment supports more quickly than someone with a short-term goal to enter into a transitional housing program). The Housing Stability Plan should be revisited frequently to enforce progress and Each service provider is responsible for developing a standard template and uniform timeline for completing the Housing Stability Plan with each household.

HUD

The Department of Housing and Urban Development (HUD) is the Federal agency responsible for national policy and programs that address America's housing needs, that improve and develop the Nation's communities, and enforce fair housing laws. HUD's business is helping create a decent home and suitable living environment for all Americans, and it has given America's communities a strong national voice at the Cabinet level.

Modified VI-SPDAT

The Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) was developed as a tool for frontline workers at agencies that work with homeless clients to prioritize which of those clients should receive assistance first. It was made in collaboration with Community Solutions, creators of the Vulnerability Index, as a brief survey that can be conducted to create a standardized vulnerability score for households presenting for services. The CSCoC uses a modified form of the VI-SPDAT to assess the vulnerability of households in the Central Sierra geographic area.

Permanent Supportive Housing

Permanent supportive housing (PSH) is an intervention that combines affordable housing assistance with voluntary support services to address the needs of chronically homeless people. The services are designed to build independent living and tenancy skills and connect people with community-based health care, treatment and employment services. PSH is long-term housing with supportive services for homeless households with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting.

Prioritization

Prioritization is the process by which all households in need of assistance who use coordinated entry are ranked in order of priority, in accordance with written standards established under 24 CFR § 547.400(e). In addition, the coordinated entry process shall, to the maximum extent feasible, ensure that households with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. This phase helps the CSCoC manage its inventory of projects, ensuring that those households with the greatest need and vulnerability receive the supports they need to resolve their housing crisis.

Projects

All community housing resources and services intended to help a household rapidly exit homelessness are referred to as projects.

Rapid Re-Housing

Rapid re-housing (RR) is an intervention designed to help individuals and families that don't need intensive and ongoing supports to quickly exit homelessness and return to permanent housing. Rapid re-housing assistance is offered without preconditions and the resources and services provided are tailored to the unique needs of the household.

Referral

Households are referred to available CSCoC housing resources and services in accordance with the CSCoC’s documented prioritization guidelines.

Scoring

HUD uses the term “scoring” to refer to the process of deriving an indicator of risk, vulnerability, or need based on responses to assessment questions. The output of most assessment tools is often an “Assessment Score” for potential project households, which provides a standardized analysis of risk and other objective assessment factors. While assessment scores generally reflect the factors included in the prioritization process, the assessment score alone does not necessarily determine the relative order of households for resources. Additional consideration, including use of case conferencing, is often necessary to ensure that the outcomes of the assessment more closely align with the community’s prioritization process by accounting for unique population-based vulnerabilities and risk factors.

Service Provider

The term service provider is used to describe ESG or CoC-funded entities, agencies, organizations, or personnel that offer and maintain projects to help households rapidly exit homelessness and participate in the CSCoC.

Transitional Housing

Transitional housing is a form of housing that facilitates the movement of homeless households to permanent housing. Households may live in transitional housing for up to 24 months and receive supportive services such as childcare, job training, and home furnishings that help them live more independently.

# General Policies

## Coordinated Entry

* 1. The Continuum of Care’s Coordinated Entry (CE) system has been developed in accordance with the HUD Continuum of Care Regulations. Participation in this system is mandatory for ESG and CoC service providers.
  2. See the Central Sierra Continuum of Care: Coordinated Entry Policies and Procedures, incorporated herein by reference.

## HMIS

* 1. All CoC and ESG service providers are required to participate in the Homeless Management Information System (HMIS) per the ESG and CoC Interim Rule (24 CFR 576 and 578). HMIS provides an opportunity to document homelessness and helps to ensure coordination between service providers while avoiding duplication of services and client data.
  2. See the Central Sierra’s HMIS Privacy Policies and Procedures, incorporated herein by reference.

## Fair Housing, Antidiscrimination, Equal Access

* 1. Affirmatively Furthering Fair Housing
     1. Fair Housing Act (federal): Service providers shall market housing and supportive services to eligible households regardless of race, color, national origin, religion, sex, age, familial status, or handicap; and, shall provide households with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws.
        1. See HUD’s Continuum of Care Program Interim Rule 24 CFR § 578.93(c) for more information.
     2. The CSCoC operates in accordance with all federal civil rights laws, including Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Titles II and III of the Americans with Disabilities Act, and HUD’s Equal Access and Gender Identity Rules.
     3. California Fair Employment and Housing Act (state): The owner of any housing accommodation may not discriminate against, harass, or make/cause to make any written or oral inquiry concerning the race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, or genetic information of a person.
        1. See California’s Fair Employment and Housing Act (Government Code, Title 2, Division 3, Part 2.8, Chapter 6 §§ 12955-12956.2) for more information.
     4. Please note, some programs may be forced to limit enrollment based on requirements imposed by their funding sources and/or state or federal laws. For example, a HOPWA-funded project might be required to serve only participants who have HIV/AIDS. All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation.
  2. Prioritized Subpopulations and Fair Housing Implications: Service providers shall comply with all applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness.
     1. Subpopulations may be prioritized if doing so does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR § 5.105; subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project. 24 CFR § 578.93(b)(2) and (7).
     2. The local standards establish priority subpopulations by project type (i.e. permanent supportive housing); service providers may not set more restrictive priorities unless a federal statute or executive order specifically authorizes this limitation, or unless expressly authorized by 24 CFR § 578.93(b)(1) to (7).
        1. For instance, while a Permanent Supportive Housing project may prioritize chronically homeless persons or households with a qualifying disability per the Local Standards, beds may not be reserved to persons with a specific disability (i.e. physical disability).
     3. If an individual or household who is otherwise qualified but who does not have a physical disability seeks admission and would benefit from the services offered, this individual or household may not be excluded from the project. Alternatively, for example, service providers may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).
  3. Reasonable Accommodations and Modifications for Persons with Disabilities: Service providers are required to provide reasonable accommodations and modifications for persons with disabilities.
     1. A reasonable accommodation is defined as changing the rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space.
        1. Permitting a person with a disability to have a service animal is an example of a reasonable accommodation.
           1. A service animal is defined under the Americans with Disabilities Act as a dog or miniature horse that is individually trained to perform tasks or do work for a person with a disability.
     2. A reasonable modification is defined as modifying a structure so that a person with a disability has the full enjoyment of the housing and related facilities.
        1. Installing a grab bar in the bathroom of a person with a disability is an example of a reasonable modification.
        2. For federally-funded housing, the service provider bears the burden of paying for the modification. Service providers must inform households during the intake process of their right to request a reasonable accommodation or modification.
  4. Preventing Involuntary Family Separation: In compliance with CoC Program interim rule 24 CFR §578.93(e), involuntary family separation is prohibited in CoC-and ESG-funded projects.
     1. CoC-and ESG-funded projects may not deny admission to any household based on:
        1. Age and gender of a child under age 18, or
        2. Gender or marital status of a parent or parents.
     2. The CoC will work with service providers to ensure that placement efforts are coordinated to avoid involuntary family separation.
     3. Any person who believes that they or a member of their household has experienced involuntary family separation may report the issue to the CoC. The CoC will investigate the claim and take remedial action when appropriate.
  5. Equal Access in Accordance with Gender Identity: Recipients must follow HUD’s requirements regarding equal access per the 2012 Equal Access Rule (77 FR 5662) and the CPD Equal Access Rule (81 FR 64782).
     1. Projects, including single-sex emergency shelters, must 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.
     2. Service providers’ policies and procedures must reflect that equal access is provided to individuals and households based on their gender identity.
     3. Once a household is admitted for assistance, service providers must take nondiscriminatory steps that may be necessary and appropriate to address privacy concerns raised by the household and, as needed, update admissions, occupancy, and operating policies and procedures in accordance with the CPD Equal Access Rule (81 FR 64782).

## Housing Requirements

* 1. Suitable Dwelling Size
     1. Service providers must establish guidelines for the appropriate unit size; these guidelines must be applied consistently for all households of like size and composition. Agency standards cannot have a disproportionate impact on specific household composition (i.e., nontraditional families). Households must be placed in units that are of suitable size: the unit must have at least one (1) bedroom or living/sleeping room for each two (2) persons.
     2. Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room.
     3. Households should be assisted in choosing a unit with the smallest number of bedrooms needed without overcrowding. Except in limited circumstances (i.e., request for reasonable accommodation, etc.), households should not be assisted in units with a greater number of bedrooms than is needed.
     4. If household composition changes during the term of assistance, households should be assisted in relocating to a more appropriately sized unit and continue to access appropriate services.
  2. HUD Housing Quality Standard List
     1. Local: Each rapid-rehousing, homelessness prevention, and permanent supportive housing provider must complete the HUD Inspection Checklist before a household moves into a unit or begins to receive assistance for a current unit.
     2. At a minimum, the inspection must cover the following categories:
        1. Housing Type
        2. Living Room
           1. Electricity/Electrical Hazards
           2. Security
           3. Window, Ceiling, Wall, and Floor Condition
           4. Lead-Based Paint
        3. Kitchen
           1. Electricity/Electrical Hazards
           2. Security
           3. Window, Ceiling, Wall, and Floor Condition
           4. Lead-Based Paint
        4. Bathroom
           1. Electricity/Electrical Hazards
           2. Security
           3. Window, Ceiling, Wall, and Floor Condition
           4. Lead-Based Paint
           5. Flush toilet, fixed wash basin, tub/shower in unit
           6. Ventilation
        5. Other Rooms Used for Living and Halls
           1. Electricity/Illumination/Electrical Hazards
           2. Security
           3. Window, Ceiling, Wall, and Floor Condition
           4. Lead-Based Paint
           5. Smoke Detectors
        6. Other Secondary Rooms (Rooms not used for living)
           1. Security
           2. Electrical Hazards
           3. Other potentially hazardous features in these rooms
        7. Building Exterior
           1. Condition of Foundation, Stairs, Rails, Porches, Roof, Gutters, Exterior Surfaces, and Chimney
           2. Lead-Based Pain
           3. Tie Downs (if manufactured home)
        8. Heating and Plumbing
           1. Adequacy/Safety of Heating Equipment
           2. Ventilation/Cooling
           3. Water Heater
           4. Approvable Water Supply
           5. Plumbing/Sewer Connection
        9. General Health and Safety
           1. Access to Unit/Fire Exits
           2. Evidence of Infestation
           3. Garbage and Debris/Refuse Disposal
           4. Interior Stairs and Common Halls
           5. Other Interior Hazards
           6. Elevators
           7. Interior Air Quality
           8. Site and Neighborhood Conditions
     3. Full HUD Inspection Checklist can be found here: <https://www.hud.gov/sites/documents/DOC_11775.PDF>
  3. Lead-Based Paint Requirement
     1. Service providers must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and the regulation at 24 CFR § 35. The applicable parts of 24 CFR § 35 are as follows:
        1. For ESG-funded shelters and housing occupied by households, service providers must comply with subparts A, B, H, J, K, M and R.
        2. For CoC-funded housing that receives project-based or sponsor-based rental assistance, service providers must comply with subparts A, B, H, and R.
        3. For CoC-funded housing that receives tenant-based rental assistance, service providers must comply with subparts A, B, M, and R.
        4. For CoC-funded residential property receiving leasing, services or operating costs, service providers must comply with subparts A, B, K and R.
     2. Lead Hazard Information Pamphlet
        1. Service providers must ensure that all households who reside in housing that was constructed pre-1978 receive the “Protect Your Family” lead-based paint hazard brochure; this form is available at: http://www.hud.gov/offices/lead/enforcement/disclosure.cfm.
        2. Sharing this information with households (or ensuring they have received it from property owners/managers) is an important opportunity to educate households about the potential hazards related to lead and their rights as tenants. Informed households are more likely to watch for potential problems in their home and proactively work with landlords to address any issues.
     3. Disclosure
        1. In addition, owners of pre-1978 housing must disclose the presence of lead-based paint and provide households with any existing documentation on known lead-based paint hazards in the unit. Service providers must document that households received this information and maintain this documentation in the household’s files; this form is available at: <http://www.hud.gov/offices/lead/enforcement/disclosure.cfm>
     4. Visual Assessments
        1. The lead‐based paint visual assessment requirement exists to protect vulnerable households from potential health hazards.
        2. A lead‐based paint visual assessment must be completed for all units that meet the following conditions:
           1. The household is moving into or remaining in a unit that is being assisted with either ESG or CoC funds; and
           2. The unit was constructed prior to 1978.
           3. For ESG- and CoC-tenant-based rental assistance, there must also be a child under the age of six (6) or a pregnant woman who is, or will be, living in the unit.
        3. For units and facilities that meet these conditions, service providers must conduct a visual assessment at least annually. For rental units, a visual assessment must be conducted prior to providing rental assistance and on an annual basis thereafter (as long as assistance is provided). The service provider must maintain the inspection record in each household’s file.
           1. Visual assessments must be conducted by a HUD‐Certified Visual Assessor.
           2. Service provider staff may complete the Visual Assessment Training at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>.
           3. The certificate of completion must be maintained on record and be readily available for review. For rental units, documentation must be kept with the HQS or Habitability Standards Worksheet, as applicable, and maintained in the household file.
     5. Exemptions to the Requirement
        1. There are certain exemptions to the lead-based paint requirements in the following circumstances:
           1. It is a residential property for which construction was completed on or after January 1, 1978.
           2. It is a zero‐bedroom or SRO‐sized unit; or
           3. It meets any of the other exemptions described in 24 CFR § 35.115(a). If any of the conditions outlined above are met, recipients need to document the condition to demonstrate that the unit is exempt from the lead-based paint requirements.

## Standards for Termination of Assistance and Grievance Procedure

* 1. Service providers must have written termination, denial, and grievance policies and/or procedures. The policies and/or procedures should be readily available to all households, both applicants and active households. Apart from high-volume shelters where it is acceptable to have policies posted in a public place, households must receive written information about program policies. It is important to effectively communicate these policies and/or procedures to ensure that they are fully understood.
     1. Denial and Grievance: Causes of denial of assistance include, but are not limited to, the household’s ineligibility or failure to provide verifiable evidence of eligibility, etc. Established procedures should describe:
        1. Circumstances in which households may not qualify or would be denied;
        2. Notification of denial; and
        3. A household’s right to review a service provider’s decision.
     2. Termination of Participation and Grievance: Involuntary termination from any project funded under the HEARTH Act places the household at great risk because he/she/they will likely exit to a place that is less safe than the project in which he/she/they are currently participating.
        1. Termination is a last option.
        2. Service providers are encouraged to limit rules of participation to only that which constitutes immediate danger. For example, in a communal living project, it would not be appropriate to terminate a household’s housing because he/she/they did not complete his/her/their chores. Service providers are encouraged to find other strategies to increase households’ contributions to their community by encouraging engagement rather than threatening loss of housing.
        3. However, there may be instances where termination cannot be avoided. The written grievance procedure must include:
           1. Written notice to the household containing a clear statement of the reason(s) for termination;
           2. A review of the decision, in which the household 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. This may include the household’s right to question or confront staff involved; and
           3. Prompt written notice of the final decision.
        4. For projects where households are required to request a review of the termination decision, households must be given an adequate amount of time to submit their request. The review must be held at a mutually agreeable time.

## Privacy and Safety for Survivors of Domestic Violence

* 1. Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking
     1. The 2013 reauthorization of the Violence Against Women Act (VAWA) and HUD’s final rule (81 FR 80798), which implements the requirements of VAWA, provide protections to victims of domestic violence, dating violence, sexual assault, and stalking under programs funded by HUD, including the CoC Program, ESG Program, and HOME Investment Partnerships (HOME) Program.
     2. Service providers are required to comply with the VAWA final rule and the locally adopted VAWA Written Standards, including the Emergency Transfer Plan, incorporated herein by reference.

## Housing First Commitment

* 1. Purpose
     1. Housing First means the evidence-based model that uses housing as a tool, rather than a reward, for recovery and that centers on providing or connecting homeless households to permanent housing as quickly as possible.
     2. Service providers in the Central Sierra Continuum of Care (CSCoC) have adopted the Housing First model across diverse program formats including permanent supportive housing, rapid re-housing, and homelessness prevention efforts.
     3. This approach has the benefit of being consistent with what most households experiencing homelessness want and seek help to achieve.
     4. CSCoC’s Housing First Principles are consistent with the State of California’s Housing First core components prescribed in CA Welfare & Institutions Code § 8255 (2016), as well as the ESG Housing First practices outlined in 25 CCR, § 8409, subdivision (b)(1)-(6).
     5. Please note, the following principles are required for CSCoC ESG and CoC funded programs only, although other programs in the Central Sierra region are encouraged to adopt these standards as well.
  2. CSCoC Housing First Principles for All Program Types
     1. Prioritizing Households with the Most Need
        1. Households are prioritized for housing and services using a standardized assessment tool, the modified VI-SPDAT, which captures the household’s unique history of homelessness, vulnerability factors, and utilization of crisis services.
        2. All households assessed using the modified VI-SPDAT are assigned a vulnerability score. The vulnerability score, in addition to the chronicity of homelessness and the experience of disabling conditions, is used to determine each household’s prioritization for housing and services as compared to other assessed households across the CSCoC. This takes the place of traditional “wait list” or “first come, first served” models.
     2. Low-Barrier Housing
        1. Each service provider will seek to quickly resolve the household’s housing crisis before focusing on other non-housing related services.
        2. The household screening and selection practices promotes accepting households regardless of their sobriety or use of substances, completion of treatment, or participation in services.
        3. Housing is not contingent on a household’s poor or lack of rental history, credit or financial history, employment status, lack of income or limited income history, mental health challenges, criminal convictions unrelated to tenancy, or ability to otherwise prove “housing readiness.” Instead, households will only be required to comply with a standard lease agreement and will be prioritized for housing based on the results of the modified VI-SPDAT.
        4. Each household will be provided with the services and supports that are necessary to help them comply with a standard lease agreement and maintain permanent housing.
        5. Housing is considered affordable when households pay no more than 30 percent of their income toward rent plus basic utilities.
        6. Participation in services or program compliance is not a condition of permanent housing tenancy.
     3. Client-Centered
        1. To the extent possible, household should be given the opportunity to choose the type of housing they prefer and the location.
        2. Households in permanent supportive housing or rapid re-housing are considered tenants and have the same rights as all tenants.
        3. Households have the option to refuse to answer questions during the screening and intake processes and still be eligible to receive services.
        4. Households should collaborate with service provider staff to fill out the Housing Stability Plan and in all other goal-setting efforts, but completion of the Housing Stability Plan is not required to receive housing or services.
           1. Please see Definitions (pg. 3) for more information about Housing Stability Plans.
     4. Cross-Agency Collaboration
        1. Service providers are encouraged to maintain a strong relationship with the CSCoC in order to build capacity around partnerships necessary to provide adequate services to households.
        2. Property management and case management functions are separate and distinct. Ideally, housing and services are provided by separate entities, units, or teams.
        3. All households will be offered referrals to other service providers as necessary.
     5. Evidence-Based Practices
        1. Service provider staff actively employ evidence-based practices in interactions with households, including progressive engagement.
        2. Service providers will focus on connecting households to preventative health care rather than emergency room visits and hospital inpatient days, leading to over-all health and well-being.
        3. Service providers will connect clients to supportive services that emphasize engagement and problem solving over therapeutic goals.
        4. All services are informed by a harm-reduction philosophy that recognizes drug and alcohol use and addiction as a part of households’ lives. Service providers will engage households in nonjudgmental communication regarding drug and alcohol use and offer educational opportunities on how to avoid risky behaviors and engage in safer practices, as well as connections to evidence-based treatment if the household so chooses.
           1. Please note, a majority of CSCoC service providers are state of California mandated reporters.[[1]](#footnote-1) Mandated reporters are required, by law, to report all known or suspected cases of child abuse or neglect, including a caregiver’s use of a controlled substance that impairs their ability to adequately care for their child.

## Progressive Engagement

* 1. Introduction
     1. As a nationally recognized best practice, the CSCoC will address homelessness through progressive engagement by creating customized levels of assistance to individuals and families to preserve the most expensive interventions for household with the most severe barriers to housing success.
     2. The CSCoC’s practice of progressive engagement helps households end their homelessness as rapidly as possible, despite barriers, with financial assistance and support resources. More supports are applied to those households who struggle to stabilize.
     3. These written standards for progressive engagement have been developed in conjunction with ESG/CoC service providers and other service providers across the community for maximum local input on the practice of progressive engagement, written standards, performance measures and the process for full implementation of the standards throughout the CSCoC in all programs including emergency shelter (ES), permanent supportive housing (PSH), rapid re­housing (RRH), and homeless prevention (HP) programs.
  2. Service Goals
     1. Service providers will work to rapidly households to stable housing.
     2. Service providers will assess each clients’ housing background to be able to assist and not refuse assistance.
     3. Service providers will link clients to other resources in the community, as necessary.
     4. All eligible households will be provided a small amount of assistance to start, in order to appropriately gauge the need of households and maximize resources.
     5. Service providers will add more assistance overtime for households with the greatest need.
     6. Service providers will identify households with the most severe barriers to housing success.
  3. Program Model
     1. Assessment is a critical first step. Each service provider adequate needs knowledge of each household’s relevant history, as well as their current plans and desires, in order to best match the resources to the household.
     2. Every household is offered the same initial package: housing location assistance, barrier debt elimination, move in, and rental assistance.
     3. Service providers will partner with households to make a realistic plan for current and future housing stabilization.
     4. Service providers will use different resources in unison, based on each household’s eligibility, goals, and strengths. Different resources will be offered at different levels or phases of assistance.
     5. Each service provider should develop an approach to identify and build relationships with willing landlords.
     6. While in the program, each household is assessed every three months to determine the types and levels of assistance required for the household to maintain permanent housing.
  4. Assessment in Phases
     1. Purpose
        1. The goal is to build an accurate and concise picture of that household’s needs and preferences in order to connect them to an appropriate intervention.
     2. Phases
        1. Initial Triage Focused on defining the nature of the current crisis and ensuring the household’s immediate safety
        2. Diversion Can occur as part of the initial triage assessment or separately; focused on assisting the household to examine their resources and options other than entering the homeless system of care through a set of set questions
        3. Standardized Prevention Screening Tool A locally developed tool intended to assess a household’s vulnerability and eligibility for prevention resources such as eviction prevention assistance.
        4. Intake Occurs when the household accepts crisis assistance, such as emergency shelter. Assessment is likely limited to collecting information necessary to enroll the household in a homeless assistance project (i.e., the homeless assistance project could be emergency shelter or coordinated entry, such as permanent supportive housing or rapid re-housing, depending on how the CoC has structured and defined crisis response interventions).
        5. Modified VI-SPDAT Collects information about a household’s potential eligibility and vulnerability for prioritization for housing and services programs.

# Standards for Emergency Shelter

## Introduction

* 1. Emergency Solutions Grant (ESG) emergency shelter funds are intended to respond to crisis and provide short-term emergency assistance.
  2. Emergency shelters provide temporary housing and services in order to assist households in obtaining stable permanent housing as quickly as possible.
  3. All ESG-funded emergency shelter is provided without additional preconditions (e.g., employment or sobriety).

## Eligibility

1. To enter ESG-funded emergency shelter, a household must be literally homeless, at imminent risk of homelessness, or fleeing/attempting to flee domestic violence.
   1. See Appendix E: HUD Definitions of Homelessness (pg. 46) for more information about these definitions.
   2. Please see Appendix F: HUD Recordkeeping Requirement (pg. 47) for more information on how to properly document eligibility for emergency shelter.
2. Access to emergency shelter is provided without preconditions, such as sobriety or ability to pay program fees.
3. Still, households are encouraged to be actively working on re-housing plans and engaging in related assistance to overcome immediate and direct barriers to securing housing.

## Prioritization

1. Access to emergency services, such as entry to emergency shelter, shall not be prioritized based on severity of service need or vulnerability. Instead, households are served on a first-come-first-served basis.
   1. Emergency shelters are not required to follow any established prioritization criteria to place households in emergency shelter.

## Intake

1. Overview
   1. Referrals to emergency shelter come from HUB Stations or other Entry Points, as outlined in the CSCoC’s Coordinated Entry System Policies and Procedures.
2. Coordinated Entry
   1. Local: Emergency shelters should strive to connect households to Coordinated Entry within 2 business days of intake (48 hours).
      1. Depending on the circumstances, this connection may take more time. At a maximum, households should be connected to Coordinated Entry within 5 business days.
   2. Households are referred to other forms of homeless assistance as needed, according to the CSCoC’s Coordinated Entry System Policies and Procedures.
3. Procedure
4. Local: Service provider staff will complete the Intake Form, Statement of Confidentiality, Resident Contract, HMIS Release, and Health Screening Forms at intake.
5. Local: Service provider staff will fill out a Housing Stability Plan with each household with the goal of achieving independent housing stability.
   1. The Housing Stability Plan process is client-centered and should include considerations of (1) household size, (2) household preference for location, and (3) household preference for housing type (e.g., shared vs. individual).
6. Before and after developing a Housing Stability Plan, households will be provided resources as necessary to meet their basic, legal, and financial needs and support the goal of achieving housing stability.
7. At a minimum, each household will be reassessed after 30 days in the shelter, to match them with appropriate services as their circumstances change.
8. Local Universal Forms – Each of the following forms should be used with each household unless otherwise noted.
9. ATCAA Emergency Shelter Packet
   1. Intake Form
   2. Statement of Confidentiality
   3. Resident Contract
   4. HMIS Release and Information Collection forms
   5. Health Screening forms
   6. Program Rules
   7. School Attendance Agreement
   8. Personal Property & Injury Waiver
   9. Housing Stability Plan
   10. Needs Assessment
   11. Satisfaction Survey

## Housing Requirements

1. Projects that receive ESG funds for shelter operations must comply with minimum safety, sanitation and privacy standards as outlined in 24 CFR § 576.403. Inspections to ensure compliance must be done before assistance is provided and at least annually.
2. All emergency shelters must also comply with the “Housing Requirements” (pg. 9-13), as applicable.

## Services Requirements

1. Overview
   1. Services will be provided for each household that cannot exit to a permanent housing destination on their own.
   2. Services will be provided without additional preconditions (e.g., employment or sobriety) and with the understanding that housing may cost greater than 30% of housing income.
2. Coordinated Entry
   1. Local: Emergency shelters should strive to connect households to Coordinated Entry within 2 business days of intake (48 hours).
      1. Depending on the circumstances, this connection may take more time. At a maximum, households should be connected to Coordinated Entry within 5 business days.
3. Procedure
   1. Participation in all services unrelated to obtaining permanent housing are completely voluntary.
   2. Local: Service provider staff will fill out a Housing Stability Plan with each household with the goal of achieving independent housing stability.
      1. The Housing Stability Plan process is client-centered and should include considerations of (1) household size, (2) household preference for location, and (3) household preference for housing type (e.g., shared vs. individual).
   3. In support of achieving the goals outlined in the Housing Stability Plan, service provider staff will provide or refer households to the following Housing-Focused Services as necessary and within the confines of their funding sources: housing search, help with rental application, negotiating with landlords and property managers, help understanding leases, coordinating services from other agencies, security deposits, utility deposits, rent payments, moving costs, credit repair counseling, resolving past evictions.
      1. These services can be provided on site or off site depending on the client’s physical needs.
   4. Before and after developing a Housing Stability Plan, households will be provided resources as necessary to meet their basic, legal, and financial needs and support the goal of achieving housing stability.
      1. Basic Services include household safety, medical emergency, adequate clothing, food, transportation, dental emergency, mental health crisis, and suicide prevention.
      2. Legal Services include help with warrants, restraining orders, parent in jail, immigration status, birth certificates, photo identification, debts and fines, and past evictions.
      3. Financial Services include temporary income, assistance with Medi-Cal application
      4. Linkages and Supports includes local Public Health Services, school enrollment, subsidized childcare, immunizations, child abuse or neglect, child car seat, and medications.
      5. For more detail about services eligible for ESG funding, please see the most recent version of the ESG Eligible Expense Guide: <https://www.hcd.ca.gov/grants-funding/docs/ESG-Eligible-Expense-Guide.pdf>
   5. At a minimum, each household will be reassessed after 30 days in the shelter, to match them with appropriate services as their circumstances change.
4. Local Universal Forms – Each of the following forms should be used with each household unless otherwise noted.
5. ATCAA Emergency Shelter Packet
   1. Intake Form
   2. Statement of Confidentiality
   3. Resident Contract
   4. HMIS Release and Information Collection forms
   5. Health Screening forms
   6. Program Rules
   7. School Attendance Agreement
   8. Personal Property & Injury Waiver
   9. Housing Stability Plan
   10. Needs Assessment
   11. Satisfaction Survey

|  |  |  |  |
| --- | --- | --- | --- |
| ESG Emergency Shelter – Summary of Eligible Activities | | | |
| Essential Services | | | |
| Case Management | Childcare | Education Services | Employment & Job Search |
| Outpatient Health Services | Legal Services | Life Skills Training | Mental Health Services |
| Substance Abuse Treatment Services | Transportation | Services for Special Populations |  |
| Renovation | | | |
| Shelter Operations | | | |
| Assistance Required Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 | | | |

## Duration of Assistance

1. Local: To the extent possible, households will be assisted in obtaining housing within 30 days of entry into the emergency shelter.
2. ESG Emergency Shelters must operate a maximum 90-day project model.
   1. All ESG-shelters will strive to reduce the average length of stay. However, households may stay longer in order to prevent returns to homelessness.
3. Exits to homelessness are avoided whenever possible, even when program rules are violated.
   1. When possible, households should be moved to other emergency shelters or more intensive programs to avoid returns to homelessness.
   2. Households will only move to another emergency shelter or a transitional housing unit when (1) they desire and choose, (2) that location is more appropriate to meet the household’s health and safety needs, and (3) No permanent housing solution is available that meets the household’s needs.
4. For more information about program exits, please see “Standards for Termination of Assistance and Grievance Procedure” (pg. 13-14).

# Standards for Rapid Re-Housing and Homeless Prevention

## Introduction

* 1. Rapid re-housing is a type of permanent housing that offers supportive services and/or rental assistance in order to help households move as quickly as possible into stable permanent housing.
     1. Rapid re-housing can be funded by through CoC or ESG.
  2. Homelessness prevention funding is used to provide short- and medium-term rental assistance and other housing services in order to prevent a household from becoming literally homeless. Homeless prevention funds help households regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing without a period of literal homelessness.
     1. Homeless prevention is funded by ESG.
  3. All ESG-RRH, ESG-HP, and CoC-RRH assistance is provided without additional preconditions (e.g., employment or sobriety) and with the understanding that permanent housing may cost greater than 30% of household income.
  4. For an overview of the different types of RRH/Housing Prevention funding sources, see Appendix K: Rapid Re-Housing/Homeless Prevention Quick Reference Sheets (pg. 57-58).

## Eligibility

1. Eligibility lays out the minimum local and federal standards required for a household to qualify for each type of assistance at different point in the process.
2. Eligible households are provided access to re-housing assistance without preconditions, such as sobriety or a minimum income level.
3. Intake
4. ESG-HP To qualify for homeless prevention (ESG-HP) assistance, clients must be literally homeless, at imminent risk of homelessness, homeless under other federal statues, or fleeing/attempting to flee domestic violence.
   * + 1. The household also must have an income below 30% AMI at intake, as documented by the service provider.
5. ESG-RRH To receive ESG rapid re-housing (ESG-RRH) assistance, an individual or family must be literally homeless.
6. ESG-RRH assistance is also available to people fleeing or attempting to flee domestic violence if they are also literally homeless (24 CFR part 576.104).
7. ESG-RRH does not require an income assessment at intake.
8. CoC-RRH To receive CoC rapid re-housing (CoC-RRH) assistance, individuals and families must be literally homeless, at imminent risk of homelessness, homeless under other federal statues, or fleeing/attempting to flee domestic violence.
   * + 1. CoC-RRH does not require an income assessment at intake.
9. Re-Evaluation
10. ESG-HP To receive ESG-HP assistance, a household must have an income below 30% of AMI at the time of re-evaluation.
    * + 1. Re-evaluation must take place no less than once every 3 months.
11. ESG-RRH To qualify for continuation of assistance, an ESG-RRH household must have an annual income at or below 30% AMI at the time of re-evaluation.
    * + 1. Local: Re-evaluation must take place no less than once every 3 months.
12. CoC-RRH Local: To qualify for continuation of assistance, a CoC-RRH household must have an annual income at or below 80% AMI at the time of re-evaluation.
    * + 1. Local: Re-evaluation must take place no less than once every 3 months.
13. See Appendix E: HUD Definitions of Homelessness (pg. 46) for more information about homelessness definitions.
    1. Please see Appendix F: HUD Record Keeping Requirement (pg. 47) for more information on how to properly document eligibility for rapid re-housing and homelessness prevention assistance.

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| --- | --- | --- | --- | --- | --- | --- |
| Summary of Eligibility Criterion for Rapid Re-Housing and Homeless Prevention (CoC and ESG) | | | | | | |
| Criterion | Initial Evaluation | | | Re-Evaluation | | |
| ESG-RRH | CoC-RRH | ESG-HP | ESG-RRH | CoC-RRH | ESG-HP |
| Literally Homeless | X | X | X |  |  |  |
| Imminent Risk of Homelessness |  | X | X |  |  |  |
| Homelessness under other Federal statutes |  | X | X |  |  |  |
| Fleeing/Attempting to flee DV | X\* | X | X |  |  |  |
| Income Evaluation Required |  |  | X | X | X | X |
| Income Requirement |  |  | 30% AMI | 30% AMI | 80% AMI | 30% AMI |
| Need (Amount and Type of Assistance) | X | X | X | X | X | X |
| Lacking Resources and Support Network |  |  |  | X | X |  |

\*Eligible only if also literally homeless

## Prioritization

1. All service providers will use the coordinated entry process to prioritize homeless households within the CSCoC geographic service area for access to homeless prevention and rapid re-housing assistance.
2. In addition to the vulnerability scores determined through the modified VI-SPDAT, additional priority will be awarded using the following elements:
   * 1. ESG-HP Scoring in Coordinated Entry prioritizes housings with a 3-5 Days’ Notice to Pay or Quit for ESG-HP assistance.
     2. ESG-RRH and CoC-RRH Prioritization decisions for ESG- and CoC-RRH are based on the following table, subject to funding and unit availability for specific subpopulations. The following chart is to be used as a guide for prioritization; however, final prioritization will include results from the weekly CES call.

|  |  |
| --- | --- |
| Prioritization for Rapid Re-Housing Assistance | |
| Priority Level | Defining Factors |
| Priority 1 | VI-SPDAT Score: 4-7 |
| Chronic Homelessness |
| Priority 2 | VI-SPDAT Score: 4-7 |
| 1+ HUD Disabling Condition(s):   * Physical Health * Mental Health * Substance Use * Developmental Disability |
| Priority 3 | VI-SPDAT Score: 4-7 |
| Priority 4 | VI-SPDAT Score: 4-7 |
| Households scoring 8+ on the VI-SPDAT may be considered for RRH if:   * The household meets other RRH criteria; * The household is referred to case conferencing due to objective, community-wide criteria; and   Through case conferencing, the community determines that there is a substantial likelihood that RRH will meet the household’s housing and service needs |

## Housing Requirements

1. Overview
2. Service providers will approve households for the minimum amount of rental assistance necessary to prevent homelessness. Households shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
3. All RRH and HP units must also comply with the “Housing Requirements” (pg. 9-13).
4. Requirements for Rental Assistance

|  |  |  |
| --- | --- | --- |
| Summary of RRH Rental Assistance Requirements | | |
|  | ESG-RRH Rental Assistance | CoC-RRH Rental Assistance |
| Housing Standards | Units must pass HUD Habitability Standards[[2]](#footnote-2) | Units must meet HUD Housing Quality Standards[[3]](#footnote-3) |
| Fair Market Rent (FMR) | Rental assistance may cover up to the FMR for a unit | Rent reasonableness is the applicable rent standard |
| Rent Reasonableness | Units must comply with HUD’s rent reasonableness standards | Units in a structure must comply with HUD’s rent reasonableness standards |
| Lease Requirements | * A written lease between the owner and the household is required for TBRA and PBRA. * For households living in housing with PBRA, the lease must have an initial term of one year. There is no minimum lease period for TBRA. * The only exception to the written lease requirement is in the case of rental assistance provided solely for rental arrears. | Households receiving TBRA must sign a lease of at least one year that is renewable (for a minimum term of one month) and terminable only for cause. |

1. Household Contribution
2. Income Assessment
3. When determining the annual income of a household to establish eligibility for ESG assistance, the service provider must count the income of all adults in the household, including nonrelated individuals.
   * + - 1. Not everyone living in the unit is considered a member of the household for the purposes of determining a household’s income.
         2. Excluded persons include: foster children, foster adults, live-in aides, children of live-in aides and unborn children.
         3. A person subject to shared-custody agreement should be counted as household member if the child resides with the household at least 50% of the time.
4. Annual income is the gross amount of income anticipated to be received by a household during the coming year based on the household’s circumstances at the time of program assessment.
5. Income generated by an asset, such as the interest on savings or checking account is considered household income even if the household elects not to receive it.
6. For example, though an applicant may elect to reinvest the interest or dividends from an asset, the interest or dividends are still counted as income anticipated to be received during the coming 12 months.
7. Income producing assets include: bank accounts; life insurance policies; lump sum additions (legal settlement, refund, etc.); personal property held as investments; retirement/pension funds; trusts; assets disposed of for less than fair market value; and stocks; bonds or mutual funds.
8. HUD provides an Income Eligibility Calculator at <https://www.hudexchange.info/incomecalculator/> that can be used as a tool to calculate household contribution. Completion of this tool does not replace required documentation materials.
9. After Assessment
   * + 1. All Programs Client will pay a percentage of their rent based on the service provider’s assessment of the household’s financial and family situation, with rental assistance decreasing monthly over time (schedule to be determined by the individual program).
          1. Initial assistance can be as much as 100% of rent.
          2. Per HUD requirements, service providers are expected to provide hardship exemptions to any rental charges if such charges could lead to the loss of housing for the assisted household.

## Service Requirements

1. Overview
2. Stabilization services are offered to each household based on demonstrated need, in support of permanent housing retention and stabilization.
   * + 1. Households are assisted with creating and (for ongoing assistance) updating individualized Housing Stability Plans, designed to re-house and stabilize households as quickly as possible.
       2. Services are offered in support of the goals identified in the household’s Housing Stability Plan and are proportional to the household’s need, as measured by the modified VI-SPDAT.
       3. Services are provided without pre-conditions such as employment or sobriety.
3. For more detail about services eligible for ESG funding, please see the most recent version of the ESG Eligible Expense Guide: <https://www.hcd.ca.gov/grants-funding/docs/ESG-Eligible-Expense-Guide.pdf>
4. Please note: Participation in services unrelated to obtaining permanent housing are voluntary.
5. The following chart outlines eligible supportive services that can be funded through CoC-RRH, ESG-RRH, and ESG-HP.
   * 1. Please note, service providers may refer households to additional programs, not funded by ESG or CoC, that do not meet the following requirements.

|  |  |  |
| --- | --- | --- |
| Summary of Eligible RRH Supportive Services | | |
|  | CoC-RRH | ESG-RRH/ESG-HP |
| Case  Management | Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of each household, including:   * Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking * Using the coordinated entry system * Counseling * Developing, securing, and coordinating services * Obtaining Federal, State, and local benefits * Monitoring and evaluating program household progress * Providing information and referrals to other service providers * Developing a Housing Stability Plan with each household * Conducting regular assessments of service needs and income | Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for each household that resides in permanent housing or to assist a household in overcoming immediate barriers to obtaining housing by, for example:   * Conducting the initial evaluation, including verifying and documenting eligibility * Using the coordinated entry system * Counseling * Developing, securing, and coordinating services * Obtaining Federal, State, and local benefits * Monitoring and evaluating program household progress * Providing information and referrals to other service providers * Developing a Housing Stability Plan with each household * Conducting regular assessments of service needs and income |
| Legal  Services | Costs of legal advice and representation in matters that interfere with the household’s ability to obtain and retain housing. Legal services or activities include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions:   * Eligible Billing Arrangements CoC funds may be used for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys.   + Costs may be based on:     - Hourly fees     - Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees * Ineligible Billing Arrangements Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements. * Eligible Subject Matters Landlord tenant disputes; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants. * Ineligible Subject Matter Legal services related to immigration and citizenship matters or related to mortgages and homeownership. | Costs of resolving a legal problem that prohibit a household from obtaining or retaining permanent housing. Legal services or activities include household intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions:   * Eligible Billing Arrangements ESG funds may be used only for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys.   + Costs may be based on:     - Hourly fees     - Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees * Ineligible Billing Arrangements Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements. * Eligible Subject Matters Landlord/tenant matters; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants. * Ineligible Subject Matter Legal services related to immigration and citizenship matters or related to mortgages. |
| Moving Costs | Reasonable one-time moving costs, including truck rental and hiring a moving company | Costs such as truck rental or hiring a moving company, including payment of temporary storage fees for up to 3 months |
| Utility Deposits | Payment of utility deposit, which constitutes a one-time fee paid to utility companies | Standard utility deposit that the utility company requires of all customers |
| Mediation | Mediation with property owners and landlords on behalf of the household. | Mediation between the household and the owner or person(s) with whom the household is living. |
| Credit  Repair | * Credit counseling * Accessing a free personal credit report * Resolving personal credit issues | * Credit counseling * Accessing a free personal credit report * Resolving personal credit problems * Other services needed to assist with critical skills related to household budgeting and money management |
| Additional Supportive Services for CoC-RRH ONLY | | |
| Childcare The costs of establishing and operating childcare and providing childcare vouchers for children in eligible households | | |
| Education Services The costs of improving knowledge and basic educational skills | | |
| Employment Assistance and Job Training The costs of establishing and operating employment assistance and job training programs | | |
| Food The cost of providing households with meals or groceries | | |
| Life Skills Training The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness but that are necessary to function independently in the community | | |
| Mental Health Services The direct outpatient treatment of mental health conditions by licensed professionals | | |
| Outpatient Health Services The direct outpatient treatment of medical conditions by licensed medical professionals | | |
| Outreach Services Activities to engage households for the purpose of providing immediate support and intervention and for identifying potential applicant households | | |
| Substance Abuse Treatment Services The costs of intake and assessment, outpatient treatment, group and individual counseling, and drug testing | | |
| Transportation  Costs of household’s travel on public transportation or in a vehicle provided by the service provider to and from medical care, employment, child care, or other eligible services | | |

## Duration of Assistance

* 1. Households and staff understand that the primary goals of rapid re-housing is to end homelessness and move households to permanent housing as quickly as possible, regardless of other personal issues or concerns.
  2. Initial Assistance Initially, CoC-RRH, ESG-RRH, and ESG-HP assistance is limited to 3 months with mandatory quarterly review for all households seeking additional financial help.
     1. Quarterly reviews may include income re-verification, home visit, discussion with landlord, financial goal setting, review of goals in Housing Stability Plan, referral to community resources and one-on-one housing counseling.
  3. Extended Assistance Continued or increased financial assistance from CoC-RRH, ESG-RRH, and ESG-HP may be recommended by rental assistance staff when circumstances show a continuing or increasing need and program households demonstrate steps taken toward goals in the individualized Housing Stability Plan. All recommendations for extended assistance will be reviewed by managerial or administrative staff.
     1. Under no circumstances may more than 18 months of assistance be provided during any 3-year period.
  4. For more information about program exits, please see “Standards for Termination of Assistance and Grievance Procedure” (pg. 13-14).

# Standards for Permanent Supportive Housing

## Introduction

* 1. Permanent supportive housing (PSH) is a non-time limited housing intervention with supportive services available to high needs households.
  2. PSH Households should strive to transition to independent, stable permanent housing in the long-term.

## Eligibility

1. At a minimum, households must meet the definitions of literal homelessness to qualify for permanent supportive housing.
   * 1. See Appendix E: HUD Definitions of Homelessness (pg. 46) for more information about homelessness definitions.
     2. Please see Appendix F: HUD Record Keeping Requirement (pg. 47) for more information on how to properly document eligibility for rapid re-housing and homelessness prevention assistance.

## Prioritization

1. All service providers must use the coordinated entry process to prioritize households within the CSCoC geographic service area for access to housing and supportive services.
2. Households will be prioritized for Permanent Supportive Housing based on HUD Notice CPD 16-11, outlined in detail below. The following chart is to be used as a guide for prioritization; however, final prioritization will include results from the weekly CES call.

|  |  |
| --- | --- |
| Prioritization for Permanent Supportive Housing | |
| Priority Level | Defining Factors |
| Priority 1 | VI-SPDAT Score: 8+ |
| Chronic Homelessness |
| 3+ HUD Disabling Conditions:   * Physical Health * Mental Health * Substance Use * Developmental Disability |
| Priority 2 | VI-SPDAT Score: 8+ |
| Chronic Homelessness |
| 2+ HUD Disabling Conditions:   * Physical Health * Mental Health * Substance Use * Developmental Disability |
| Priority 3 | VI-SPDAT Score: 8+ |
| Chronic Homelessness |
| 1 HUD Disabling Condition:   * Physical Health * Mental Health * Substance Use * Developmental Disability |
| Priority 4 | VI-SPDAT Score: 8+ |

## Housing Requirements

1. Inspection Requirements
   * 1. All CoC housing, including permanent supportive housing and rapid re-housing, must meet applicable housing quality standards (HQS) under 24 CFR § 578.75(b). HQS requirements are contained within 24 CFR § 982.401, which state the performance and acceptability criteria for the key aspects of housing quality listed in Table 11.1.
     2. All permanent supportive housing must also comply with the “Housing Requirements” (pg. 9-13), as applicable.
2. Rental Assistance
3. Rental assistance funds may be used to provide households with short-, medium- or long-term rental assistance as outlined below. Rental assistance cannot be provided to households who are already receiving rental assistance or are living in a housing unit receiving rental assistance or operating assistance through other federal, state, or local sources, excluding transfers between programs.
4. Administering rental assistance, contracting for rental assistance, and making rental assistance payments to landlords, as well as conducting Housing Quality Standards (HQS) Inspections are a service delivery cost of rental assistance and is therefore an eligible cost under this section.
5. Other eligible costs of administering rental assistance include examining household income and family composition; providing housing information and assistance; and receiving new households into the program.

|  |  |  |  |
| --- | --- | --- | --- |
| CoC Rental Assistance – Eligible Costs | | | |
| Length of Housing Assistance | | | |
| Short-Term (up to 3 months) | Medium-Term  (from 3 to 24 months) | | Long-Term  (>24 months) |
| Model of Assistance | | | |
| Tenant Based – Households choose unit | Service Provider Based - Households reside in housing  owned or leased by service provider | | Project Based - Units are provided through a contract with the owner |
| Other Eligible Costs | | | |
| Vacancy Payment – up to 30  days following end of the  month when unit vacated | Property Damage – may not  exceed one month’s rent; one-time cost per household at the time the household exits the unit | | Security Deposits –  not to exceed 2 months of rent |
| Administering Rental Assistance – Eligible Costs | | | |
| Processing rental payments to  landlords | Examining household income  and family composition | | Providing housing information  and assistance |
| Inspecting units for compliance with Housing  Quality Standards (HQS) | | Receiving new households into the program | |

|  |  |
| --- | --- |
| CoC Rental Assistance – Key Requirements | |
| Unit Rent Standard | The unit rent must be reasonable in comparison to similar units and cannot exceed comparable unassisted units. |
| Unit Lease – Lease and Rental Assistance  Agreement | Households must have a lease agreement with the landlord/owner of housing. In addition, households may make rental assistance payments only to  landlords/owners with whom the service provider has a rental assistance agreement. The rental assistance agreement must include the terms under which rental assistance will be provided, the term of the agreement, that the landlord/owner will provide the recipient with a copy of all written notices to the household (including notices to vacate, notices of noncompliance, etc.). |
| Household Rent Contribution | Except in rapid re-housing projects, households must contribute toward their rent in accordance with 3(a)(1) of the U.S. Housing Act of 1937 (42 USC 1437a(a)(1)). Changes to rental payment amounts must be made as changes in income are identified (no less than annually). |

1. Leasing
2. Specifics
   * + 1. Leasing funds under the CoC program may be used to lease a structure or individual units to provide housing or supportive services to households. Funds cannot be used to lease units or structures owned by the service provider, their parent organization(s), or other organizations more fully described in 24 CFR § 578.49(a), unless authorized by HUD.
       2. Where utilities are included in the rent amount, utilities (electricity, gas, water) are considered a leasing cost. Where the utilities are separate from the rent, they are considered an operating cost. Utilities for supportive service structures are considered a supportive services cost regardless of utilities being included or excluded from the rent amount.
       3. Leasing funds may be used to pay a security deposit, but it must not exceed two months of actual rent. It is permissible to pay first and last month’s rent.
3. Summary

|  |  |  |  |
| --- | --- | --- | --- |
| CoC Leasing – Eligible Costs | | | |
| Length of Housing Assistance | | | |
| Unlimited | | | |
| Model of Assistance | | | |
| Structure(s) | Portion of Building(s) | | Individual Units |
| Other Eligible Costs | | | |
| Vacancy Payment – Service providers must abide by the terms of the master lease and pay rent for the unit regardless of whether the unit is occupied. However, the service provider must make every effort to house an eligible household in the vacant unit as quickly as possible. | | | |
| Utilities (electricity, gas, water) –  only if included in the rent | | Security Deposits –  not to exceed 2 months of rent | |
| \* Damages are not an eligible leasing cost. | | | |

|  |  |
| --- | --- |
| CoC Leasing – Key Requirements | |
| Unit Rent Standard | Rent paid by the service provider for a unit must be reasonable in comparison to similar units, cannot exceed comparable unassisted units and cannot exceed Fair Market Rent. |
| Unit Lease – Master  Lease and Sublease | Service providers must have a “master” lease agreement with the landlord/owner. Leasing costs are paid directly to the landlord/owner in accordance with the master lease. Service providers must have a sublease in place with households. |
| Household Rent Contribution | Service providers are not required to have households pay rent, but if they choose to charge households rent, the rent must be calculated in accordance with 24 CFR § 578.77, and cannot exceed the highest of 30% of the household’s adjusted monthly income, 10% of the household’s monthly income, or the welfare rent. Any household rent that is collected is considered Program Income and must be used for eligible costs in accordance with 24 CFR § 578.97. |

## Services Requirements

1. At a minimum, case managers will conduct an on-site visit at the PSH unit every 90 days.
   * 1. Additional case management can occur either on-site or at the service provider’s site, as necessary and coordinated with the client.
2. PSH programs, through collaborative arrangement and/or by referral, must offer services to all clients that are tailored to each client’s needs. Services include, but are not limited to:
3. Housing Support
   * + 1. Intake and assessment
       2. Rental assistance
       3. Legal assistance
       4. Assistance with housing applications
       5. Information and training regarding tenants’ rights and responsibilities
       6. Education and assistance around landlord-tenants’ rights and responsibilities
       7. Mediation and negotiation with landlords
4. Socialization & Daily Function
5. Daily living skills training
6. Budgeting and money management skills and training
7. Skills and training in maintaining a household
8. Eligibility screening for, and assistance applying for and retaining mainstream resources (SSI, CalWORKs, Medi-Cal, Veterans benefits, etc.)
9. Vocational and employment assistance or training and referral
10. Supportive employment and referral for employment
11. Interpersonal communication skills
12. Transportation, including accompaniment to appointments, home visits
13. Childcare
14. Parenting information and education
15. Conflict resolution and crisis intervention
16. Helping households connect to meaningful daily activities
17. Social, cultural, or recreational activities
18. Opportunities for peer-to-peer education and support
19. Support groups and other services to maintain, preserve, and promote independence, including optimal physical, social, and psychological development and functioning
20. Wellness
21. Service coordination
22. Mental health counseling and education
23. Substance abuse education and counseling
24. Effective use of health care (medical/dental/mental health/psychiatric)
25. Preventive health services

|  |  |  |  |
| --- | --- | --- | --- |
| CoC Supportive Services – Summary of Eligible Costs | | | |
| Annual Assessment of  Service Needs | Assistance with Moving Costs | | Case Management |
| Employment Assistance & Job Training | Food | | Housing Search  & Counseling Services |
| Mental Health Services | Outpatient Services | | Outreach Services |
| Child Care | Education Services | | Legal Services |
| Life Skills Training | Substance Abuse Treatment Services | | Transportation |
| Utility Deposits | | Direct Provision of Services | |

## Duration of Assistance

1. There is no designated length of stay for households of this type of housing. permanent supportive housing is intended to be available to households for as long as it provides housing assistance that meets their needs.
2. Successful exits from permanent supportive housing include exits to other permanent housing destinations.
3. Permanent housing providers may only terminate households from housing in cases of noncompliance with the lease or when otherwise legally necessary. Service providers must take all reasonable measures to keep the households in the program and re-house them elsewhere.
4. Households cannot be terminated involuntarily for refusal of services or for violation of program rules that are not stipulated in the lease.
5. Please see “Standards for Termination of Assistance and Grievance Procedure” (pg. 13-14) for more information.

Appendix

# A. Homeless Emergency Aid Program (HEAP) Guidelines

1. **Introduction**
   1. HEAP is a one-time aid program through the state of California, intended to provide immediate, one-time, flexible funding to CoCs to address the homelessness crisis throughout California.
   2. HEAP is administered through the California Homeless Coordinating and Financing Council (HCFC). More information about programming can be found here: [Business, Consumer Services and Housing Agency HCFC website.](https://www.bcsh.ca.gov/hcfc/)
   3. In the CSCoC, HEAP funding is being used to fund capital improvements, showers, wash stations, emergency food kits, and tiny cabins for individuals experiencing homelessness or at risk of homelessness. HEAP funding is also being used to fund encampment clean ups done by law enforcement.
2. **Household Eligibility**
   1. HEAP funding can only be used to serve households experiencing homelessness or at imminent risk of homelessness.
   2. At least 5% of HEAP funds must be used to establish or expand services meeting the needs of homeless youth or youth at risk of homelessness.
      1. Consistent with other state and federal definitions, HCFC considers “homeless youth” to mean an unaccompanied homeless individual who is not older than 24, for purposes of HEAP.
      2. Homeless individuals not older than 24 who are parents are included in this definition.
      3. See Appendix E: HUD Definitions of Homelessness (pg. 46) for more information about these definitions.
      4. Please see Appendix F: HUD Record Keeping Requirement (pg. 47) for more information on how to properly document eligibility for HEAP programs.
3. **Additional Guidance**
   1. In the interest of spending down all funds, funds can be shifted among eligible project types with coordination between the CoC, ATCAA (the Administrative Entity), and the service provider.
   2. If a service provider is unable to fully spend down their allotted funds, the funding will be transferred back to the CSCoC, per HEAP guidelines. For the funds being transferred, the county that originally housed the transferred the funds will get priority.
   3. If you are a service provider interested in changing your project or transferring your funds, please refer to the [HEAP Program Guidance Document](https://www.bcsh.ca.gov/hcfc/documents/heap_overview.pdf) and contact ATCAA.

# B. California Emergency Solutions and Housing (CESH)

1. **Introduction**
   1. CESH is a one-time aid program through the state of California created to fund a variety of activities to assist households experiencing or at risk of homelessness.
   2. CESH is administered by the California Department of Housing and Community Development (HCD). More information about the department can be found here: [California Department of Housing and Community Development website](http://www.hcd.ca.gov/).
   3. In the CSCoC, CESH is being used to fund prevention efforts and to provide Point-in-Time (PIT) count incentives.
2. **Household Eligibility** 
   1. At a minimum, households receiving CESH-funded assistance must be experiencing homelessness or at risk of homelessness.
      1. See Appendix E: HUD Definitions of Homelessness (pg. 46) for more information about these definitions.
      2. Please see Appendix F: HUD Record Keeping Requirement (pg. 47) for more information on how to properly document eligibility for CESH programs.
   2. Per HCD, household eligibility requirements must follow HUD CoC standards for each project type. For example, households participating in a CESH-funded HP program must be at or below 30% AMI when their income in verified at intake.
      1. For additional homeless prevention household eligibility requirements, please see the “Standards for Rapid Re-Housing and Homeless Prevention” section on pg. 24-25.
3. **Household Prioritization** 
   1. Per the ATCAA contracting process, CESH service providers are required to follow the CSCoC prioritization scheme for homelessness prevention.
      1. Please see the “Standards for Rapid Re-Housing and Homeless Prevention” section on pg. 26 for more information about prioritization.

C. HOMELESS HOUSING, ASSISTANCE AND PREVENTION PROGRAM (HHAP)

1. **Introduction** 
   1. HHAP program is a California block grant program designed to provide jurisdictions with one-time grant funds to support regional coordination and expand or develop local capacity to address their immediate homelessness challenges
   2. HHAP programs are required to expend funds on evidence-based solutions including, but not limited to, rental assistance, rapid re-housing, operating subsidies, landlord incentives, outreach, coordination, diversion, prevention, and delivery of permanent housing.
2. **Household Eligibility** 
   1. Households must be experiencing homeless, at risk of homelessness, homeless under other federal statues, or fleeing/attempting to flee domestic violence to participate in homeless-facing programs funded by HHAP.
      1. See Appendix E: HUD Definitions of Homelessness (pg. 46) for more information about these definitions.
      2. Please see Appendix F: HUD Record Keeping Requirement (pg. 47), as well as Appendix H: Documentation for Chronic Homelessness (pg. 49-50) for more information on how to properly document eligibility for HHAP programs.
   2. Per HCD, household eligibility requirements must follow HUD CoC standards for each project type. For example, households participating in a HHAP-funded HP program must be at or below 30% AMI when their income in verified at intake. For more information for eligibility for each project type, please see the following sections:
      1. Emergency Shelter: pg. 19
      2. Rapid re-housing and/or homeless prevention: pg. 24-25
      3. Permanent supportive housing: pg. 33
3. **Additional Guidance for Service Providers** 
   1. Per the ATCAA contracting process, HHAP service providers are required to follow the CSCoC prioritization scheme for homelessness prevention, rapid re-housing, and permanent supportive housing.
      1. Please see pg. 26 for guidance around prioritization for homeless prevention and rapid re-housing homeless projects.
      2. Please see pg. 33 for guidance around prioritization for permanent supportive housing project.
   2. Prioritization for other project types will be outlined during the ATCAA contracting process.

# D. Components of Eligible ESG and CoC Activities

1. **Introduction** 
   1. This section outlines the allowable activities within each project as defined under both ESG and CoC.
      1. Activities are a set of allowable costs. For example, a phone line for a case manager might be considered a Supportive Services activity under the transitional housing component for the CoC Program.
   2. ESG and CoC Programs each have five (5) eligible components.
      1. Rapid re-housing, homeless prevention and HMIS are allowable components of both funding sources; however, the activities that are allowable vary by program type.
      2. Street outreach and emergency shelter are eligible under ESG only.
      3. Permanent supportive housing and transitional housing are unique to the CoC Program.
   3. In the CSCoC, ESG is currently being used for emergency shelter, homelessness prevention, and rapid re-housing. CoC funding is currently being used for rapid re-housing and permanent supportive housing.
2. **Emergency Solutions Grant Eligible Components**
   1. Street Outreach 24 CFR § 576.101 (ESG Only)
      1. ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people, referred to as street outreach.
   2. Emergency Shelter 24 CFR § 576.102 (ESG Only)
      1. Emergency shelter is defined as any facility, where the primary purpose is to provide “a temporary shelter for the homeless in general, or for specific populations of the homeless people and which does not require occupants to sign leases or occupancy agreements.”
   3. Homelessness Prevention 24 CFR § 576.103 (ESG Only)
      1. Homelessness prevention provides housing relocation, stabilization services and short and medium-term rental assistance necessary to prevent a household from moving into an emergency shelter or another place described in Category 1 of the HUD definition of homelessness.
         1. Please see Appendix D. HUD Definitions of Homelessness (pg. 45) for more information.
   4. Rapid Re-Housing 24 CFR § 576.104 (ESG)
      1. Rapid re-housing provides housing relocation, stabilization services and short- and medium-term rental assistance to help homeless households move as quickly as possible into permanent housing and achieve stability in that housing.
   5. HMIS 24 CFR § 576.107 (ESG)
      1. Section 416(f) of the McKinney-Vento Act requires for the first time that ESG-funded projects participate in the Homeless Management Information System (HMIS). The ESG interim rule makes certain costs eligible to the extent necessary to enable this participation.
   6. Administrative Costs (ESG)
      1. ATCAA retains all administrative funds to manage contracts, complete monitoring, and complete reimbursement activities.
3. **Continuum of Care** 
   1. CoC Eligible Activities by Component

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| CoC Eligible Activities by Component | | | | |
|  |  | PSH | RRH | TH |
| Housing Costs | Leasing | X |  | X |
| Rental Assistance | X | X | X |
| Operating | X |  | X |
| Supportive Services | | X | X | X |
| HMIS | | X | X | X |
| Administration | | X | X | X |
| Indirect Costs | | X | X | X |

* 1. Leasing 24 CFR § 578.49 (CoC)
     1. Leasing funds under the CoC Program may be used to lease a structure or individual units to provide housing or supportive services to households. Funds cannot be used to lease units or structures owned by the service provider, their parent organization(s), or other organizations more fully described in 24 CFR §578.49(a) unless authorized by HUD.
        1. For more information about CoC leasing requirements, please see pg. 36-37 of this document.
  2. Rental Assistance 24 CFR § 578.51 (CoC)
     1. Rental assistance funds may be used to provide households with short-, medium-or long-term rental assistance. Rental assistance cannot be provided to households who are already receiving rental assistance or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources, excluding transfers between programs.
        1. For more information about CoC rental assistance requirements, please see pg. 26-27.
  3. Supportive Services 24 CFR § 578.53 (CoC)
     1. Supportive services funds may be used to provide supportive services that address the special needs of households. Services must be limited to those which assist households in obtaining and maintaining housing. Ongoing, at least annual, assessments of service needs are required, and services should be adjusted accordingly. Where supportive services are provided within a facility not contained in a housing structure, the costs of operation of the facility are eligible, including maintenance, repair, building security, utilities and equipment.
  4. Operating Costs 24 CFR § 578.55 (CoC)
     1. Operating funds may be used to pay the day-to-day costs of operation of transitional and permanent housing in a single structure or individual units. Operating costs for supportive service facilities are considered supportive services.

|  |  |  |  |
| --- | --- | --- | --- |
| CoC Operating – Eligible Costs | | | |
| Model of Assistance | | | |
| Structure | | Individual Units | |
| Eligible Costs | | | |
| Repair & Maintenance | Property Tax & Insurance | Scheduled payments to reserve | Security\* |
| Electricity, Gas & Water | Furniture | Equipment |
| \*Where >50% of the units are paid for with grant funds | | | |

|  |  |
| --- | --- |
| CoC Operating – Key Requirements | |
| Unit Rent Standard | Not applicable. |
| Unit Lease | Households must have a lease or occupancy agreement with the service provider. |
| Household Rent Contribution | Service providers are not required to have households pay rent, but if they choose to charge households rent, the rent must be calculated in accordance with 24 CFR § 578.77, and cannot exceed the highest of 30% of the household’s adjusted monthly income, 10% of the household’s monthly income, or the welfare rent. Any household rent that is collected is considered Program Income and must be used for eligible costs in accordance with 24 CFR § 578.97. |

* 1. HMIS 24 CFR § 578.57 (CoC)
     1. HMIS funds may be used to pay the costs of contributing data to the CSCoC Homeless Management Information System (HMIS).

|  |  |  |  |
| --- | --- | --- | --- |
| CoC HMIS – Eligible Costs | | | |
| Purchasing/Leasing  Computer Hardware | Purchasing Software or  Software Licenses | Purchasing/Leasing  Equipment  (telephones, fax  machines, furniture) | Obtaining Technical  Support |
| Leasing Office Space | Electricity, Gas, Water,  Phone Service, High  Speed Data  Transmission | Salaries for Operating  HMIS | Costs of Staff to Travel  and Attend HUD  Sponsored/ Approved  Training on HMIS |
| Staff Travel Costs to  Conduct Intake | Participation Fees  Charged by the Lead |

* 1. Project Administration 24 CFR § 578.59 (CoC)

|  |  |  |  |
| --- | --- | --- | --- |
| CoC Administrative Costs | | | |
| General Management & Oversight | | | |
| Preparing Budgets & Schedules | Assure Compliance | | Development of Agreements to  Carry Out Program Activities |
| Monitoring for Progress &  Compliance | Preparing HUD Reports | | Coordinating Resolution of Findings |
| Evaluating Results & Objectives | | Managing/Supervising Staff Who Engage in  General Management & Oversight | |
| Training on CoC Requirements | | Environmental Reviews | |

* 1. Indirect Costs 24 CFR §578.63
     1. Indirect costs are eligible under the CoC Program and must be in accordance with OMB Uniform Guidance.

# E. HUD Definitions of Homelessness

|  |  |  |
| --- | --- | --- |
| Category 1 | Literally Homeless | Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:   * 1. Has a primary nighttime residence that is a public or private place not meant for human habitation;   2. Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or   3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution |
| Category 2 | Imminent Risk of Homelessness | Individual or family who will imminently lose their primary nighttime residence, provided that:   1. Residence will be lost within 14 days of the date of application for homeless assistance; 2. No subsequent residence has been identified; and 3. The individual or family lacks the resources or support networks needed to obtain other permanent housing |
| Category 3 | Homeless Under Other Federal Statutes | 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:   1. Are defined as homeless under the other listed federal statutes; 2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; 3. Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and 4. Can be expected to continue in such status for an extended period due to special needs or barriers |
| Category 4 | Fleeing/  Attempting to Flee Domestic Violence | Any individual or family who:   1. Is fleeing, or is attempting to flee, domestic violence; 2. Has no other residence; and 3. Lacks the resources or support networks to obtain other permanent housing |

# F. HUD Record Keeping Requirements

|  |  |  |
| --- | --- | --- |
| Category 1 | Literally Homeless | * Written observation by the outreach worker; or * Written referral by another housing or service provider; or * Certification by the individual or head of household seeking assistance stating (s)he was living on the streets or in shelter * For individuals exiting an institution—one of the forms of evidence above and:   + Discharge paperwork or written/oral referral, or   + Written record of intake worker’s due diligence to obtain above evidence and certification by individuals that they exited institution |
| Category 2 | Imminent Risk of Homelessness | * A court order resulting from an eviction action notifying the individual or family that they must leave; or * For individuals 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 non subsequent resident has been identified; and * Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing |
| Category 3 | Homeless Under Other Federal Statutes | * 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 the 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 more barriers |
| Category 4 | Fleeing/  Attempting to Flee Domestic Violence | * For victim service providers:   + 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:   + 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. |

# G. Eligibility By Component

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Component | Funding | HUD Homeless Category | | | Income Limits | Chronic Homeless (CH) |
| 1 | 2 | 4 |
| Emergency Shelter | ESG | X | X | X |  |  |
| Homeless Prevention | ESG, HEAP |  | X | X | X |  |
| RRH | ESG | X |  |  | X\* |  |
| RRH | CoC | X | X | X | X\* |  |
| TH | CoC | X | X | X |  |  |
| PSH | CoC | X |  |  |  | Prioritized |

X = required component

\*required at reassessment, not required at intake

*Category 3 is not included because CSCoC does not currently serve this type of household using existing funding sources. Future state and federal grant opportunities may expand the CSCoC’s ability to serve this population.*

*For more information about HUD’s Categories of Homelessness, please see Appendix E pg. 46.*

# H. Documentation for Chronic Homelessness

In order to establish that an individual is chronically homeless, a service provider must produce documentation for (1) the history of homelessness, (2) proof of disability, and (3) proof of current homelessness. The following list provides the range of acceptable forms of documentation for each category, in the order to HUD’s preference.

1. **History of Homelessness**

For at least one day of each 30 days of homelessness, staff must document the location of homelessness and supporting documentation:

* 1. Locations
     1. Streets
     2. Emergency Shelter
     3. Safe Haven
     4. Institution (less than 90 days)
  2. Supporting documentation can include (in order of HUD preference):
     1. HMIS
     2. Comparable Database
     3. Observation by Outreach
     4. Discharge Paperwork
     5. Referral
     6. Self-Certification
        1. Must include staff documentation of situation AND documentation of steps to obtain evidence
     7. Please be advised that if at least 75% of the households assisted in a project during an operating year include some months supported by self-certification, no more than 3 months can be self-certified per client. Please check with you project administrator to ensure your project has not exceeded its self-certification cap.
  3. Staff must record the month(s) and years of each break, if applicable.
     1. Uniquely, breaks may be documented fully based on self-report from the individual seeking assistance.

1. **Proof of Disability** 
   1. Written verification from a professional licensed by the state
   2. Written verification from the Social Security Administration
   3. Receipt of a disability check
   4. Intake staff-recorded observation of disability confirmed no later than 45 days from the application for assistance AND at least one other piece of evidence
   5. Other documentation approved by HUD
2. **Proof of Current Homelessness** 
   1. HMIS records (or other comparable database)
   2. Written observation by outreach or intake worker
   3. Written community member observation of where the individual was living/lives
   4. Written referral by another housing or service provider
   5. If no other evidence is available, a certification by the individual seeking assistance

# I. Written Standards for Street Outreach

*Note: Currently, the CSCoC currently does not fund street outreach. The Written Standards for Street Outreach are being included in this appendix to guide the development of future programs.*

1. **Introduction**
   1. The primary goals of street outreach:
      1. Provide access to emergency shelter and services; and
      2. Re-house households in permanent housing as quickly as possible, regardless of other personal issues or concerns.
2. **Household Eligibility** 
   1. At a minimum, households must be experiencing unsheltered homelessness.
      1. See Appendix E: HUD Definitions of Homelessness (pg. 46) for more information about this definitions.
      2. Please see Appendix F: HUD Record Keeping Requirement (pg. 47) for more information on how to properly document eligibility for street outreach programs.
3. **Household Prioritization**
4. Program admission is prioritized for the households with the most urgent and severe needs (as defined in 25 CCR **§** 8409).
5. **Outreach**
6. **All households contacted through outreach are screened as soon as possible for critical health and safety needs to identify people with the most severe service needs (including people who are chronically homeless and/or with active mental health or substance abuse issues) and provide an appropriate response.**
7. **Outreach is comprehensive and coordinated with other CSCoC assistance and the CSCoC’s Coordinated Entry System to assure access to assistance regardless of where a household is located in the CSCoC’s service area.**
8. **Services**
9. **Households are provided access to emergency shelter, permanent housing, and services without preconditions, such as sobriety or minimum income level.**
10. **Households are provided or connected to housing location and placement assistance, including financial assistance for move-in costs, to achieve their Housing Plan goals.**
11. **Assistance is provided:** 
    * + 1. **Without additional preconditions, such as employment or sobriety; and**
        2. **With understanding that housing may cost greater than 30% of household income.**
12. **Connections to the Coordinated Entry System**
13. Street outreach programs accept referrals through the CSCoC’s Coordinated Entry System and triages referrals according to the CSCoC’s Coordinated Entry System Procedures.
14. **Households are referred to other forms of homeless assistance in the CoC service area according to the CoC’s Coordinated Entry System Policies & Procedures.**
15. Service provider staff should be made aware of and know how to access an emergency shelter, transitional housing, and a wide variety of housing options (public/private, subsidized/unsubsidized, local permanent supportive housing, etc.) directly or through the CSCoC’s Coordinated Entry System to help households achieve their Housing Stability Plan goals.
16. **Upon receipt of services through the street outreach program, households will be associated with creating and updating individualized Housing Stability Plans designed to access emergency shelter and/or re-house and stabilize households as quickly as possible.**
17. **Households are expected to be actively working on Housing Stability Plans and engaging in related assistance to overcome immediate and direct barriers to securing housing, with the support of service providers.**
18. Participation in services unrelated to obtaining permanent housing is voluntary.
19. Service provider staff should be informed of, and know how to access, other community resources (e.g., legal services) that can help households achieve their Housing Stability Plan goals.
20. Eligible Costs for ESG-Funded Street Outreach
21. Engagement
22. Case Management
23. Emergency Health Services
24. Emergency Mental Health Services
25. Transportation
26. Services for Special Populations
27. **Duration of Assistance**
28. HUD ESG funding guidelines do not establish a maximum length of time that a household can receive assistance through street outreach.
29. Please see “Standards for Termination of Assistance and Grievance Procedure” (pg. 13-14) for more information.

# J. Previously Adopted Written Standards for Transitional Housing

*Note: Currently, the CSCoC does not fund transitional housing due to HUD’s priority for PSH and RRH units. The Written Standards for Transitional Housing are being included in this appendix to guide the development of future transitional housing projects from diverse funding sources and preserve the robust local standards around transitional housing.*

1. **Introduction**
   1. Transitional housing (TH) is designed to households with the interim stability and support to successfully move to and maintain permanent housing.
2. **Eligibility**
3. At a minimum, households accessing transitional housing must be literally homeless, at imminent risk of homelessness, or fleeing/attempting to flee domestic violence.
   * 1. See Appendix E: HUD Definitions of Homelessness (pg. 46) for more information about this definitions.
     2. Please see Appendix F: HUD Record Keeping Requirement (pg. 47) for more information on how to properly document eligibility for transitional housing programs.
4. **Prioritization**
5. All service providers will use the coordinated entry process to prioritize households within the CSCoC geographic service area for access to housing and supportive services.
   * 1. Households accessing TH will be prioritized based on their level of vulnerability as assessed by the modified VI-SPDAT.
6. **Housing Requirements**
7. Household Contribution
   * 1. Households will pay no more than 30% of their income towards rent with the remaining balance to be paid by the program fund.
8. Household Requirements
   * 1. Households in transitional housing must enter into a lease agreement on a month to month basis with a minimum of one-month lease upon entry.
     2. Transitional dwelling units are for full time occupancy only.
     3. Only members of a household with a signed agreement can dwell within the unit. If there are extenuating circumstances, the household’s point of contact at the service provider must be notified as soon as possible. The service provider must then provide written approval verifying that an individual outside of the household may dwell within the unit.
     4. If a member of the household is under medical or psychiatric care and have been prescribed medication, that member must be taking medication as prescribed.
     5. Members of the household cannot ingest alcohol or illegal drugs on the premises.
     6. Members of the household cannot be in possession of weapons on the premises.
     7. Dwelling unit must be kept neat and orderly, and the exterior of the house must be maintained free of trash and debris, especially cigarette butts. All decks and porches must be clear and free of furniture, clothing or other debris.
     8. Members of the household may not bring or keep non-operative vehicles on the premises.
     9. Members of the household on probation, or other court-ordered programs, must comply with the terms and conditions of those programs.
9. Inspection Requirements
10. All CoC-housing, including transitional housing, must meet applicable housing quality standards (HQS) under 24 CFR § 578.75(b). HQS requirements are contained within 24 CFR § 982.401, which state the performance and acceptability criteria for the key aspects of housing quality listed in Table 11.1.
11. All TH units must also comply with the “Housing Requirements” (pg. 9-13).
12. Leasing Requirements
    * 1. Specifics
         1. Where utilities are included in the rent amount, utilities (electricity, gas, water) are considered a leasing cost.
         2. Where the utilities are separate from the rent, they are considered an operating cost.
         3. Utilities for supportive service structures are considered a supportive service cost regardless of utilities being included or excluded from the rent amount.
         4. Leasing funds may be used to pay a security deposit, but it must not exceed two months of actual rent. It is permissible to pay first and last month’s rent.

|  |  |  |  |
| --- | --- | --- | --- |
| CoC Leasing – Eligible Costs | | | |
| Length of Housing Assistance | | | |
| Up to 24 Months | | | |
| Model of Assistance | | | |
| Structure(s) | Portion of Building(s) | | Individual Units |
| Other Eligible Costs | | | |
| Vacancy Payment Service providers must abide by the terms of the master lease and pay rent for the unit regardless of whether the unit is occupied. However, the service provider must make every effort to house an eligible household in the vacant unit as quickly as possible. | | | |
| Utilities (electricity, gas, water) –  only if included in the rent | | Security Deposits not to exceed 2 months of rent | |
| \* Damages are not an eligible leasing cost. | | | |

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| CoC Leasing – Key Requirements | |
| Unit Rent Standard | Rent paid by the recipient for a unit must be reasonable in comparison to  similar units, cannot exceed comparable unassisted units and cannot exceed Fair Market Rent (FMR). |
| Unit Lease – Master  Lease and Sublease | Service providers must have a “master” lease agreement with the landlord/owner. Leasing costs are paid directly to the landlord/owner in accordance with the master lease. Service providers must have a sublease in place with households. |
| Household Rent Contribution | Service providers are not required to have households pay rent, but if they choose to charge households rent, the rent must be calculated in accordance with 24 CFR § 578.77, and cannot exceed the highest of 30% of the household’s adjusted monthly income, 10% of the household’s monthly income, or the welfare rent. Any household rent that is collected is considered Program Income and must be used for eligible costs in accordance with 24 CFR § 578.97. |

1. **Services Requirements**
2. Overview
3. Transitional housing programs must develop service plans with each household and provide or offer referrals for identified services that address each household’s ongoing needs. Service planning should be initiated at intake and focus on identifying and transitioning households to the most appropriate permanent housing situation.
   * + 1. Service providers will conduct quarterly case management meetings with each household.
4. Services include, but are not limited to:
5. Crisis intervention;
6. Legal assistance;
7. Service coordination;
8. Emergency and ongoing identification of medical and health needs and referral for care;
9. Public benefits eligibility assessment and application assistance;
10. Educational and employment assistance;
11. Exit planning, housing search, and relocation assistance;
12. Education related to activities of daily living (life skills);
13. Preventive health education, including information about prevention of HIV/AIDS, Tuberculosis and Sexually Transmitted Disease;
14. Substance abuse and mental health counseling;
15. Support groups;
16. Structured social/recreational activities;
17. Parenting education;
18. Job referral and placement;
19. Childcare;
20. Transportation;
21. Domestic violence counseling; and
22. Other appropriate services as necessary to support the goal of connecting clients to sustainable permanent housing.
23. **Duration of Assistance**
24. Except in extenuating circumstances, households will exit transitional housing to permanent housing within 24 months.
    * 1. Local examples of extenuating circumstances include situations in which a household is anticipated to be connected with permanent housing quickly; if the household has a 990 and is having difficulty locating housing as result; and if a household’s sobriety could be compromised by a return to homelessness.
    1. Transitional housing households are not involuntarily discharged without due process and the opportunity to resolve issues.
       1. Please see “Standards for Termination of Assistance and Grievance Procedure” (pg. 13-14).

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| --- | --- | --- | --- | --- |
| K. Rapid Rehousing/Homeless Prevention Quick Reference Sheet | | | | |
|  | ESG-HP | ESG-RRH | CoC-RRH | CESH-HP |
| Income  Limit at Intake | Required – 30% AMI | Not required at initial evaluation (i.e. no minimum or maximum income limits when determining the initial eligibility of a household) | Not required at initial evaluation (i.e. no minimum or maximum income limits when determining the initial eligibility of a household) | Required – 30% AMI |
| Income Limit at Re-Evaluation | Required – 30% AMI | Required – 30% AMI | Required – Not to exceed 80% AMI [Local Requirement] | Required – 30% AMI |
| Frequency of Re-Evaluation | No less than every three months | No less than every three months | No less than every three months [Local Requirement] | N/A |
| Regulation | Under the ESG program, income eligibility is based on the HUD income limits in effect at the time of income verification. Income eligibility is not based on HUD income limits that correspond with the grant year under which the ESG funds were awarded. | Under the ESG program, income eligibility is based on the HUD income limits in effect at the time of income verification. Income eligibility is not based on HUD income limits that correspond with the grant year under which the ESG funds were awarded. | HUD does not mandate that CoC-funded RRH recipients meet income limits and thus provides no specific regulations. | The state has not mandated any income limits. This is up to local discretion. |
| Helpful Links | HUD Income Limits:  <https://www.huduser.gov/portal/datasets/il.html> | | | |

*(continues on next page)*

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| --- | --- | --- | --- | --- |
|  | ESG-HP | ESG-RRH | CoC-RRH | CESH-HP |
| Type of Assistance | * Short-term rental assistance (up to 3 months) * Rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears) | * Short-term rental assistance (up to 3 months) * Medium-term rental assistance (4 to 18 months) * Rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears) | * Short-term rental assistance (up to 3 months) * Medium-term rental assistance (4 to 24 months) | No state or local mandates at this time |
| Model | * Tenant-based rental assistance * Project-based rental assistance | * Tenant-based rental assistance * Project-based rental assistance | * Tenant-based rental assistance only | No state or local mandates at this time |
| Eligible Costs | Financial assistance costs:   * Rental application fees * Security deposits (up to 2 months) * Last month’s rent * Utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears) * Moving costs | Financial assistance costs:   * Rental application fees * Security deposits (up to 2 months) * Last month’s rent * Utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears) * Moving costs | Financial assistance costs:   * Security deposit * First and last month’s rent * Property damage | No state or local mandates at this time. |
| Duration of Assistance | Maximum of 3 months of assistance [Local Requirement] | Maximum of 18 months of assistance over a 3-year period [Local Requirement] | Maximum of 24 months | No state or local mandates at this time |
| Frequency of Use | Once every 2 years | Up to 18 months of assistance over a 3-year period | Up to 24 months of assistance over a 3-year period | No state or local mandates at this time |

This chart captures both HUD mandates and locally established requirements. Any guidance/mandate that is not followed by “[Local Requirement]” is a HUD or State requirement.

**ADDENDUM TO COC & ESG WRITTEN STANDARDS**

**GRANTS MANAGEMENT SUPPORT:   
Adjusting ESG Written Standards for ESG-CV**

During COVID-19, coronavirus Emergency Solutions Grants (ESG-CV) recipients should collaborate with local and state public health partners to integrate infection control practices into homeless service delivery systems where appropriate. If any ESG written standards must be updated due to the need to prepare for, prevent, and respond to COVID-19, then recipients will need to document these changes. If changes to regular ESG written standards are minimal as a result of ESG-CV updates, these changes can be documented in an addendum. This product outlines the most common areas that may need to be updated in regular ESG written standards and provides sample framing language that may be used or adapted for local context.

**Back to Basics: What are the ESG Written Standards Requirements?**

See the ESG Program regulations at [24 CFR 576.400(e))](https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/pdf/CFR-2017-title24-vol3-sec576-400.pdf).

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| --- | --- |
| **State Recipients** | **Metropolitan Cities / Urban Counties / Territories** |
| The recipient must establish and consistently apply (or require that its subrecipients establish and consistently apply) written standards for providing ESG assistance. These standards must be:   1. Established for each area covered by a Continuum of Care (CoC) or area over which the services are coordinated and followed by each subrecipient providing assistance in that area; or 2. Established by each subrecipient and applied consistently within the subrecipient’s program.   Written standards developed by the state must be included in the state’s Consolidated Plan. If the written standards are developed by its subrecipients, the recipient must describe its requirements or the establishment and implementation of these standards in the state’s Consolidated Plan. | If the recipient is a metropolitan city, urban county, or territory, the recipient must have written standards for providing ESG assistance and they must be included in its Consolidated Plan. |

**Written Standards Commonly Requiring Updates   
for Coronavirus Response**

| **Required ESG Written Standard** | **ESG-CV Addendum Language – Sample Written Standard** |
| --- | --- |
| Coordinate with public health partners to establish COVID-19-specific procedures where appropriate. If compliance with public health guidance is different for victims of domestic violence or other protected populations, document these alternative procedures. | Core parts of the way crisis response systems operate may change as a result of COVID-19. If a recipient has set COVID-19 standards for how major parts of the system operate, they should be documented in their ESG-CV written standards.  Sample Language:  *If shelters utilize symptom screening as a part of intake procedures, it must be reviewed and approved by a local public health partner such as the county’s or state’s department of public health or the Healthcare for the Homeless partner.*  *Shelters funded by ESG-CV must establish referral pathways to isolation and quarantine if a client is in need of such services.*  *Shelters funded through ESG-CV will maintain social distancing requirements established in partnership with the county’s or state’s department of public health.* |
| Expanded Definition of ESG-CV-Eligible Shelter Funds. | ESG-CV allows for a variety of spaces to be used as temporary shelters. If the recipient funds new and different kinds of shelter, that should be explained.  Sample Language:  *The purpose of ESG-CV funds is to prevent, prepare for, and respond to COVID-19 in order to prevent and mitigate the spread of COVID-19 among people experiencing homelessness and the staff that provide services to these individuals. This requires that existing shelters implement public health protocols such as enforcing social distancing, establishing an isolation space (especially for residents suspected of having COVID-19, those with confirmed cases, and high-risk residents such as elderly people and people with pre-existing health conditions), using personal protective equipment (PPE), and cleaning/disinfecting shared and living spaces. In many communities where existing shelter is not available or where current shelters are not able to implement these safety protocols, additional space may need to be identified to allow people to have shelter while staying as healthy as possible. This may be space within an existing shelter (e.g., an office not being used) that could be temporarily converted into a quarantine space for someone who has tested positive or is awaiting test results, or it could be an entirely separate building*. *Eligible shelter spaces may include public spaces, pop up or modular structures in compliance with* [*U.S. Department of Housing and Urban Development (HUD) guidance*](https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-Alternative-Approaches-to-Winter-Sheltering-During-COVID-19.pdf)*. (Adapted from Michigan State).* |
| Standard policies and procedures for evaluating individuals’ and families’ eligibility for assistance under ESG. | Coordinated entry systems (CES) may consider modifying and expediting the *assessment, scoring, and eligibility determinations* to prioritize those at high risk for severe illness from COVID-19 for shelter and housing. Coordinated entry modifications must be consistent with fair housing and nondiscrimination requirements.  Sample Language:  *In collaboration with the local Healthcare for the Homeless, the jurisdiction has streamlined and updated the CES Assessment to include COVID-19 vulnerabilities outlined in the state protective health order which established non-congregate shelters (NCS) for people experiencing homelessness. This assessment will be used for housing placement during the pandemic.* |
| Standards for targeting and providing essential services related to street outreach. | If standards for providing street outreach have been updated or modified locally, document those changes and ensure that they are developed in coordination with public health partners. A sample alternative street outreach activity could include:   * Distribution of masks or other PPE, if available, to people who are unsheltered. * Provision of handwashing stations and portable bathrooms. * Maintaining social distancing requirements during engagement.   Sample language:  “*HUD has approved the following as eligible costs under street outreach:*   * *Engagement: Hand sanitizer, soap, tissue packets, masks, disposable gloves, other PPE.* * Case Management: Coordinating medical care. * *Transportation: Train or bus tokens, taxi or rideshare for program participants’ travel to and from medical care.* * *Expanded Staffing: Hiring additional staff to support infectious disease preparedness, providing hazard pay to staff with direct participant contact,*” *(From* [*Michigan State*](https://www.michigan.gov/documents/mshda/ESG-CV_NOFA_689109_7.pdf)*).* |
| Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding the length of stay, if any, and safeguards to meet the safety and shelter needs of special populations (e.g., victims of domestic violence, sexual assault, and stalking) and individuals and families who have the highest barriers to housing and are likely to be homeless the longest. | Emergency shelters are a vital, life-saving resource that play a key role in communities’ COVID-19 responses. Recipients may choose to establish basic policies ensuring that shelters maintain operations and remain accessible to people experiencing homelessness who are particularly vulnerable to adverse health outcomes related to COVID-19 infection.  Sample Language:  *Shelters funded by ESG-CV may not turn away eligible program participants and must establish referral pathways to other shelter or housing if the shelter is at maximum capacity. Shelters must establish referral pathways to isolation and quarantine if a client is in need of such services.*  *Someone who presents at an ESG-funded shelter with respiratory symptoms (e.g., cough) should not be turned away solely because of their health symptoms.*  *Shelters funded by ESG-CV are strongly discouraged from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection.*  *Any ESG-funded shelter that is considering closing or not accepting new residents must immediately notify the local CoC, public health authority, and emergency management officials.* |
| Policies and procedures for assessing, prioritizing, and reassessing individuals’ and families’ needs for essential services related to emergency shelter. | During COVID-19, jurisdictions may consider changing assessment or prioritization to include COVID-19 vulnerabilities such as age, specific health conditions, and/or medical frailty.  Sample Language:  *“Under this state of emergency, HUD supports communities considering other prioritization elements as necessary to prevent the spread of COVID-19 among those who are homeless or at risk of homelessness and to respond to those already impacted by the pandemic.” (From* [*Michigan State*](https://www.michigan.gov/documents/mshda/ESG-CV_NOFA_689109_7.pdf)*)* |
| Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing (RRH) assistance providers; other homeless assistance providers; and mainstream service and housing providers (see §576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable). | ESG-CV-specific areas of coordination that may be new and different from regular ESG expectations likely involve the role that public health partners will play in service delivery and access to medical care.  Sample Language:  *The local department of public health is available to conduct testing for people experiencing homelessness at X shelters or at Y locations. ESG-CV funded shelters and outreach programs should encourage (but may not require) people experiencing homelessness to get tested if they are experiencing COVID-19 symptoms.*  *Shelters in the jurisdiction are encouraged to use funds provided through ESG-CV to purchase technology to access telehealth services provided through Healthcare for the Homeless.* |
| Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive RRH assistance. | States and jurisdictions may update prioritization policies to house people at severe risk of contracting COVID-19.  Sample language:  *Local jurisdictions may prioritize the use of ESG-CV funds for proven strategies, especially RRH for those experiencing homelessness. Note: people cannot be denied RRH because of zero income.” (From* [*Michigan State*](https://www.michigan.gov/documents/mshda/ESG-CV_NOFA_689109_7.pdf)*.)*  *Targeted Prevention: Based on race equity analysis, the jurisdiction will target prevention services to three marginalized areas of town (identify three areas). These three areas of town serve disproportionally large communities of Black, Indigenous, and people of color who experience homelessness. They have been historically underserved and had poor access to permanent housing solutions offered by the homeless response system.*  *The CES will prioritize placement in ESG-CV-funded RRH programs for people who meet the state’s protective health order that provides non congregate shelter to protect people experiencing homelessness from becoming seriously ill from COVID-19. The protective health order outlines a variety of eligibility factors for non-congregate shelter. Validation of priority status must be obtained from the NCS operator.* |
| Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or RRH assistance. | States and jurisdictions may consider updating written standards in this area to provide opportunities to address the economic impact of COVID-19.  Sample language:  *Under the Coronavirus Aid, Relief, and Economic Security (CARES) Act ESG-CV funding, there will be no rental payment requirement for households receiving financial assistance.*  *Projects funded are expected to serve people with zero income.* |
| Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time. | States and jurisdictions may consider updating written standards in this area to provide opportunities to address the economic impact of COVID-19.  Sample Language:  *The CARES Act provides that ESG-CV funds may be used to mitigate the economic impact of COVID-19. Programs are encouraged to consider the maximum number of rental assistance months be extended/adjusted to address unemployment, loss of income, or benefits due to COVID-19.*  *RRH sub-recipients must use a progressive engagement model; this practice supports using the least intensive intervention to help resolve homelessness for the individual or family. Providers are to add more assistance only as necessary if the less intensive intervention is unsuccessful. RRH households receiving rental assistance subsidies must contribute a minimum of 30 percent of their monthly adjusted income toward their monthly rent. This tenant rent contribution may be adjusted at any time based on changes to household income. There is no minimum rent requirement and tenant rent contribution may be zero for households with no income.* |
| Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits (if any) on the homelessness prevention or RRH assistance that each program participant may receive (such as the 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). | States and jurisdictions may consider updating written standards in this area to provide opportunities to address the economic impact of COVID-19.  Sample Language:  *“ESG-CV funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the ‘homeless’ definition in 24 CFR 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the ‘at risk of homelessness’ definition, or who meet the criteria in the ‘homeless’ definition at 24 CFR 576.2 and have an annual income below 50 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR 576.105, the short- and medium-term rental assistance requirements in 24 CFR 576.106, and the written standards and procedures established under 24 CFR 576.400.*” *(*[*Sample from South Carolina*](http://oeo.sc.gov/documents/OEO_ESG-CV_HandbookCARESActandHUD_Waiver.docx)*)*  *Landlord Incentives: ESG-CV funds may be used to pay for landlord incentives that are reasonable and necessary to obtain housing for individuals and families experiencing homelessness and at risk of homelessness. Landlord incentives may not exceed three times the rent charged for the unit. Eligible landlord incentives include:*   * Signing bonuses equal to 2 months of rent. * *Security deposits equal to up to three months of rent, or the state statute.* * *Costs to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit.* * *Paying the costs of extra cleaning or maintenance of a program participant’s unit or appliances.* |

1. For a full list of mandated reporters, please see California Penal Code Section 11165.7 [↑](#footnote-ref-1)
2. 24 CFR § 576.403(c) [↑](#footnote-ref-2)
3. 24 CFR § 982.401, 24 CFR § 578.75(b) [↑](#footnote-ref-3)