



# **CONTRA COSTA COUNTY CONTINUUM OF CARE**

## **WRITTEN STANDARDS FOR PROVIDING COC AND ESG ASSISTANCE**

*Adopted by Contra Costa Council on Homelessness – June 6, 2019*

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## PURPOSE

The HEARTH Act requires the Contra Costa County Continuum of Care to have written standards that govern the provision of assistance to individuals and families. All programs that receive Emergency Solutions Grant (ESG) or Continuum of Care (CoC) funding are required to abide by these written standards. Agency program procedure should reflect the policy and procedures described in this document. The CoC strongly encourages programs that do not receive either of these sources of funds to accept and utilize these written standards. The written standards have been established to ensure that persons experiencing homelessness who enter programs throughout the CoC will be given similar information and support to access and maintain services and housing.

The written standards are not intended to be in lieu of or in place of the Interim Regulations for the HEARTH Act but are intended to clarify local decisions regarding program administration. All HUD funded providers must follow the Interim Regulations in their entirety.

## KEY TERMS AND DEFINITIONS

The following are key definitions contained in this document. In addition, future sections will define additional terms, such as definitions of homelessness, which can be found in the “Participant Eligibility and Documentation Requirements” section below.

- A. **Continuum of Care (CoC):** The Contra Costa County Continuum of Care carries out the responsibilities required under HUD regulations, set forth at 24 CFR 578 – Continuum of Care Program. The CoC is comprised of a broad group of stakeholders dedicated to ending and preventing homelessness in Contra Costa County. CoC membership is open to all interested parties and includes representatives from organizations within Contra Costa County. The over-arching CoC responsibility is to ensure community-wide implementation of efforts to end homelessness and ensuring programmatic and systemic effectiveness of the local Continuum of Care program.
- B. **Contra Costa Council on Homelessness (CoH):** The governing body of the Contra Costa Continuum of Care, serving as an Advisory Body to the Contra Costa County Board of Supervisors.
- C. **Coordinated Entry System (CES):** The process to ensure that homeless individuals and families in Contra Costa County, and those at risk of homelessness, receive the best services to meet their housing needs.
- D. **Homeless Management Information System (HMIS):** A local information technology system designated by the Continuum of Care in order to collect, track, and report uniform information on participant needs and services and enhance community-wide service planning and delivery.
- E. **Housing First:** A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold).
- F. **Participant:** Individual or household that is enrolled in a CoC- or ESG-funded program.

- G. **Survivor of Domestic Violence:** Anyone who has experienced, or is fleeing, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

## GENERAL STANDARDS

Providers must ensure programs conform to applicable eligibility and other requirements established by federal and state rules. Those requirements may include, but are not limited to: the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act (42 USC 11302); the U.S. Department of Housing and Urban Development (HUD) Continuum of Care Program Interim Rule, 24 CFR Part 578; CoC Final Rule Defining “Homeless”; CoC Final Rule Defining “Chronically Homeless”; federal ESG regulations and definitions, including CFR 576.1 et seq., 24 CFR 576.400 et. seq; Notice on Coordinated Entry, CPD 17-01; Notice on Order of Priority in CoC Program-Funded Permanent Supportive Housing Beds, CPD 16-11; Final Rule: Violence Against Women Reauthorization Act 2013 – Implementation in HUD Housing Programs (24 CFR 200 et. seq) (VAWA); Final Rule on Equal Access in Accordance with an Individual’s Gender Identity in Community Planning and Development Programs (24 CFR Part 5), and other regulations set forth governing eligible use of CoC and ESG funds. Where not specifically set forth below, those regulations are incorporated by reference into these written standards.

## PARTICIPANT ELIGIBILITY AND DOCUMENTATION REQUIREMENTS

- A. **The Continuum of Care (CoC) Program** provides funding for the following program types: Permanent Supportive Housing, Rapid Rehousing, Transitional Housing, Supportive Services Only (including Coordinated Entry), HMIS, and Planning. There are four categories of participant eligibility: (1) Literally Homeless, (2) Imminent Risk of Homelessness, (3) Homeless Under Other Federal Statutes (subject to cap), and (4) Fleeing/Attempting to Flee Domestic Violence. The Contra Costa County Continuum of Care elects to serve categories 1, 2, and 4 due to the shortage of resources for those priority populations and excessive demand.
- B. **The Emergency Solutions Grant (ESG) Program** provides funding for Rapid Rehousing, Homeless Prevention, Street Outreach, HMIS, and Emergency Shelter. To receive ESG Rapid Rehousing (ESG-RRH) assistance, an individual or family must demonstrate at initial evaluation that it is Literally Homeless (aka Category 1). To receive ESG Homeless Prevention (ESG-HP) assistance, an individual or family must demonstrate at initial evaluation that it meets the criteria under the “at risk of homelessness” definition C.F.R. § 576.2, or meets the criteria for one of the following categories: (2) Imminent Risk of Homelessness, (3) Homeless Under Other Federal Statutes (subject to cap), and (4) Fleeing/Attempting to Flee Domestic Violence; AND has an annual income below 30 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 a participant regain stability in the participant's current permanent housing or move into other permanent housing and achieve stability in that housing. In order to gain access to ESG Emergency Shelter (ESG-ES) services, individuals or families must meet the HUD definition of homeless under Category 1, 2, or 4.
- C. **Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility for the following relevant categories:**

**1. Literally Homeless**

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- i. Has a primary nighttime residence that is a public or private place not meant for human habitation;
- ii. 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
- iii. 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.

**Eligibility should be documented in the following manner (in order of preference):**

- i. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
- ii. Written observation by an outreach worker; or
- iii. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter.

If the provider is using anything other than a Third-Party Verification, the case file must include documentation of due diligence to obtain third party verification.

**2. Imminent Risk of Homelessness**

Individual or family who will imminently lose their primary nighttime residence, provided that:

- i. Residence will be lost within 14 days of the date of application for homeless assistance;
- ii. No subsequent residence has been identified; and
- iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing.

**Eligibility should be documented in the following manner (in order of preference):**

- i. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
- ii. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- iii. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
- iv. Certification that no subsequent residence has been identified; and
- v. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

**3. Homeless Under Other Federal Statute (Not Applicable in The Contra Costa County Continuum of Care)**

**4. Fleeing/Attempting to Flee Domestic Violence (DV)**

Any individual or family who:

- i. Is fleeing, or is attempting to flee, domestic violence;
- ii. Has no other residence; and
- iii. Lacks the resources or support networks to obtain other permanent housing.

**Eligibility should be documented in the following manner (in order of preference):**

**For victim service providers:**

- i. 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:**

- i. 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
- ii. Certification by the individual or head of household that no subsequent residence has been identified; and
- iii. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

**D. Chronically Homeless**

For all dedicated/prioritized chronically homeless units, participants must meet the chronically homeless definition as stated in Definition of Chronically Homeless final rule, which is:

1. A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
  - i. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
  - ii. Has been homeless and living as described in (i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in (i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;
2. An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
4. A “**disability**” is defined as having one or more of:
  - I. Physical, mental or emotional impairment
  - II. Developmental disability
  - III. HIV/AIDS

**Homeless eligibility should be documented in the following manner (in order of preference):**

- i. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
- ii. Written observation by an outreach worker; or
- iii. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter.

If the provider is using anything other than a Third-Party Verification, the case file must include documentation of due diligence to obtain third party verification.

**Disability eligibility should be documented in the following manner:**

- i. Disability documentation must be third-party and must be documented by:
  - a. A professional licensed by the state to diagnose and treat that condition; or
  - b. Social Security Administration (SSA) for persons receiving disability benefits.
- ii. Intake staff observations
  - a. Only acceptable in the absence of third-party verification and must be confirmed and accompanied by written third-party verification no later than 45 days from initial intake.
- iii. Oral third-party and self-certification are not appropriate for documenting disability.

**E. At Risk of Homelessness**

An individual or family who:

- i. Has an annual income below 30% of median family income for the area; AND
- ii. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND
- iii. Meets one of the following conditions:
  - a. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
  - b. Is living in the home of another because of economic hardship; OR
  - c. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
  - d. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR



- e. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
- f. Is exiting a publicly funded institution or system of care; OR
- g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the Contra Costa Consortium Consolidated Plan (Con Plan).

**F. Recordkeeping Requirements**

1. All records pertaining to CoC funds will be retained for 5 years from the expenditure of the grant, or, in the case of documentation of each program participant’s eligibility and other program participant records, for 5 years after the expenditure of all funds from the grant under which the program participant was served. 24 CFR 578.103(c)(1-3). Records required include the following, according to 24 CFR 578.103(a):
  - i. Verification of Homeless Status
  - ii. Verification of Chronic Homeless Status (if applicable)
  - iii. Annual Income Verification and Rent Contribution Calculation for Participants receiving Housing Assistance
  - iv. Program Participant Records
  - v. Signed Occupancy Agreements or Leases
  - vi. Notice of Occupancy Rights and Certification Forms required by VAWA
  - vii. Housing Quality Standards Checklist
  - viii. Services Provided
  - ix. Other records required by HUD or individual programs
2. ESG Programs will maintain additional documentation to demonstrate:
  - i. The program participant met with a case manager at least once per month. 24 CFR 576.401(e)(1-2) and 24 CFR 576.500(f).
  - ii. The program used a plan to assist the program participant to retain permanent housing after the ESG assistance ends, 24 CFR 576.401(d)(1); 24 CFR 576.401(d)(2); 24 CFR 576.500(f).
  - iii. Programs made efforts to assist each program participant to obtain mainstream or other resources as needed. 24 CFR 576.401(d)(1); 24 CFR 576.401(d)(2); 24 CFR 576.500(f).
  - iv. Rental Assistance Agreements were entered into with each owner before providing the owner with rental assistance payments. 24 CFR 576.106(e), 24 CFR 576.500(h), 24 CFR 576.106(f).
3. HUD may monitor projects as long as records are maintained. 24 CFR 578.103(d)(1). All client files are available for HUD monitoring, and will be reviewed during CoC monitoring visits at least once per fiscal year.

The Contra Costa County Continuum of Care has adopted a Housing First approach in CoC and ESG programs. The Housing First approach is characterized by progressive engagement and assistance practices including:

1. Ensuring low-barrier, easily accessible assistance to all people, including, but not limited to, people with no income or income history, and people with active substance abuse or mental health issues;
2. Helping participants quickly identify and resolve barriers to obtaining and maintaining housing;
3. Seeking to quickly resolve the housing crisis before focusing on other non-housing related services;
4. Allowing participants to choose the services and housing that meets their needs, within practical and funding limitations;
5. Connecting participants to appropriate support and services available in the community that foster long-term housing stability;
6. Offering financial assistance and supportive services in a manner which offers a minimum amount of assistance initially, adding more assistance over time if needed to quickly resolve the housing crisis by either ending homelessness, or avoiding an immediate return to literal homelessness or the imminent risk of literal homelessness. The type, duration, and amount of assistance offered shall be based on an individual assessment of the household, and the availability of other resources or support systems to resolve their housing crisis and stabilize them in housing; and
7. Notwithstanding subdivision (6) above:
  - i. Rapid Rehousing activities funded within the same Continuum of Care service area shall follow the same program requirements for type, duration, and amount of assistance provided, unless sufficient written justification for any differences is provided by the Continuum of Care and approved by the California Department of Housing and Community Development; and
  - ii. Homeless prevention activities funded within the same Continuum of Care Service area shall follow the same program requirements for type, duration, and amount of assistance provided, unless sufficient written justification for any differences is provided by the Continuum of Care and approved by the California Department of Housing and Community Development.
8. Any other practices promoted or required by HUD.

## PRIORITIZATION

The Contra Costa County Continuum of Care prioritizes individuals and families, including victims of domestic violence, as follows:

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### ORDERS OF PRIORITY (HUD NOTICE CPD 16-11)

The Contra Costa County CoC has adopted the order of priority described in Notice CPD 16-11.

#### **Order Of Priority In CoC Program-Funded Permanent Supportive Housing Beds Dedicated Or Prioritized For Occupancy By Persons Experiencing Chronic Homelessness**

- A. The Contra Costa County CoC adopts the recommended order of priority established in Notice CPD 16-11 to ensure that those persons experiencing chronic homelessness with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens, and with the most severe service needs are given first priority in PSH beds dedicated or prioritized for occupants by persons experiencing chronic homelessness. A chronically homeless individual or head of household must meet the definition stated in the Definition of Chronically Homeless final rule (see Participant Eligibility and Documentation Requirements section above).
- B. A standardized Coordinated Entry assessment tool will be used by all CoC providers with a focus on length of time homeless and severity of the individual's or family's service needs to establish priority. Chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs will be given first priority. Housing match and placement will be conducted in accordance with these established priorities and facilitated through the Coordinated Entry system.
- C. Where there are no chronically homeless individuals and families within the CoC's geographic area, CoCs and recipients of CoC Program-funded PSH are encouraged to follow the order of priority for non-prioritized, non-dedicated beds described below.

**Order of Priority in Permanent Supportive Housing Beds Not Dedicated Or Prioritized For Persons Experiencing Chronic Homelessness**

**FIRST PRIORITY:** Homeless Individuals and Families with a Disability with a Long Period of Episodic Homelessness and Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.

**SECOND PRIORITY:** Homeless Individuals and Families with a Disability with Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

**THIRD PRIORITY:** Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelters without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

**FOURTH PRIORITY:** Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

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#### ORDERS OF PRIORITY FOR ESG-FUNDED ACTIVITIES

The Contra Costa County CoC adopts the recommended order of priority established in 25 CCR 8409 for ESG-funded activities. The CoC will prioritize access to assistance for people with the most urgent and severe needs, including, but not limited to, survivors of domestic violence. ESG-funded activities shall seek to prioritize people who:

- A. Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings;
- B. Have experienced the longest amount of time homeless;
- C. Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own; and
- D. For homelessness prevention activities, people who are at greatest risk of becoming literally homeless without an intervention and are at greatest risk of experiencing a longer time in shelter or on the street should they become homeless.

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#### EMERGENCY TRANSFERS

An Emergency Transfer Plan provides for emergency transfers for survivors of domestic violence receiving rental assistance or residing in units subsidized under a covered housing program (including CoC- and ESG- funded programs).

**A. Emergency Transfer Plan**

A client qualifies for an emergency transfer if:

- 1. The client is a survivor of domestic violence, dating violence, sexual assault or stalking;
- 2. The client expressly requests the transfer; *and*
- 3. Either:
  - a. The client reasonably believes there is a threat of imminent harm from further violence if the client remains in the same dwelling unit; or
  - b. If the client is a survivor of sexual assault, the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.

**B. Emergency Transfer Process**

A client may submit an emergency transfer request directly to program staff. The program must communicate with the Coordinated Entry System Manager to inform them that an emergency transfer request has been made and whether the request is for an internal transfer (a transfer where the client would not be categorized as a new applicant), external transfer, or both. A client may seek an internal and external emergency transfer at the same time if a safe unit is not immediately available. The program will take reasonable steps to support them in securing a new safe unit as soon as possible and a transfer may not be necessary.

Programs will ensure strict confidentiality measures are in place to prevent disclosure of the location of the client's new unit to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the client.

Where a family separates as part of the emergency transfer, the family member(s) receiving the emergency transfer will retain the rental assistance when possible. The program will work with the CoC and the household to support an effective transfer in situations where the program is not a good fit for the family member(s) receiving the emergency transfer.

**C. Internal Transfer**

Where the client requests an internal emergency transfer, the program should take steps to immediately transfer the client to a safe unit if a unit is available. Requests for internal emergency transfers should receive at least the same priority as the program provides to other types of transfer requests.

If a safe unit is not immediately available, program staff will inform the client that a unit is not immediately available and explain the options to:

1. Wait for a safe unit to become available for an internal transfer,
2. Request an external emergency transfer, and/or
3. Pursue both an internal and external transfer at the same time in order to transfer to the next available safe unit in the CoC.

**D. External Transfer**

If a client requests an external emergency transfer, the client has priority over all other applicants for CoC-funded housing assistance, provided the household meets all eligibility criteria required by HUD and the program. After the agency communicates the client's emergency transfer request to the Coordinated Entry System Manager, they will facilitate referral of the participant to the next available appropriate unit through the Coordinated Entry System. The household retains their original homeless status for purposes of the transfer.

**E. Documentation and Record Keeping**

To request an emergency transfer, the client should submit a written request to program staff, certifying that they meet the emergency transfer qualification requirements. The program may – but is not required to – request additional documentation of the occurrence for which the client is requesting an emergency transfer. No other documentation is required.

Programs must retain records of all emergency transfer requests and their outcomes for a period of 5 years following the grant year of the program in which the household was a participant and report them to HUD annually.

## PROGRAM INTAKE

### A. **Distribution of Written Program Rules and Process for the Termination of Assistance**

At intake (prior to the provision of financial assistance), all programs must ensure participants receive a written copy of program rules and the process for terminating assistance. Evidence of this should be preserved in the participant's file.

### B. **Required Violence Against Women Act (VAWA) Notifications for Participants**

Programs must provide each individual or family applying for CoC or ESG assistance the Notice of Occupancy Rights and the Certification Form described in 24 CFR 5.2005 at each of the following times:

1. When an individual or family is denied assistance;
2. When a program participant is admitted to a program;
3. When a program participant receives notification of eviction; and
4. When a program participant is notified of termination of assistance.

Evidence of this should be preserved in the participant's file. When HUD grant funds are used for rental assistance, the program must ensure that the owner or manager of the housing provides the Notice of Occupancy Rights and Certification Form to the participant with any notification of eviction.

## STANDARDS FOR ADMINISTERING ASSISTANCE

### PERMANENT SUPPORTIVE HOUSING (PSH)

#### **Structure of Permanent Supportive Housing Assistance**

Permanent Supportive Housing (PSH) is community-based permanent housing with case management, and is the most intensive housing intervention available under the CoC program.

#### **A. Goals of Assistance**

1. After entering the PSH program, the household remains stably housed, either remaining in PSH or exiting to another permanent housing location.
2. Some participants in PSH may choose to move into other subsidized housing, with a lower level of supportive services. While clients will be supported to move to other subsidized housing when appropriate, this will not be a goal for every PSH client.

#### **B. Duration/Client Contributions**

1. There can be no predetermined length of stay in a PSH program.

2. All participants in CoC-funded PSH programs must enter into a lease or occupancy agreement for an initial term of at least one year. The lease must continue automatically upon expiration, except on prior notice by either party. The lease agreement must observe Fair Housing regulations.
3. CoC-funded PSH programs must comply with CoC Program requirements regarding client portion of rent, occupancy charges, FMR and Rent Reasonableness.
  - i. Participants in PSH rental assistance programs are expected to pay the higher of 30% of their income (monthly, adjusted) or 10% of their gross monthly income toward rent (including utilities). If the participant has zero income, the participants are not required to pay rent, but their supportive services partner is expected to work with them to secure income (either earned or unearned) as soon as possible. In no circumstance can a tenant be charged an amount above the rent calculation standard established by HUD.
  - ii. Participants in leasing programs may be charged an occupancy charge up to 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance.

### **Eligibility Requirements**

In order to qualify for PSH, households must satisfy the following criteria:

- A. Be the highest priority household available according to the orders of priority outlined in the "Prioritization" section above.
- B. Other eligibility criteria created at the program level as allowed by HUD.
- C. *CoC-Funded Programs*: For CoC-funded PSH programs, participants must meet the following eligibility requirements:
  1. The individual or household must meet the definition of homeless in the CoC Program Interim Rule, under Category 1 or Category 4.
  2. Participants who are homeless under Category 1 and are entering from transitional housing must have entered the transitional housing program from emergency shelter or a place not meant for human habitation. (NOTE: if the project is designated for chronically homeless, the participant may only enter from the street or shelter. Individuals may lose their chronically homeless designation after they enter a transitional housing program).
  3. The individual or at least one member of the household must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition.
- D. All CoC-funded PSH projects are strongly encouraged to prioritize or dedicate beds to chronically homeless individuals and families, including chronically homeless youth and domestic violence survivors.
- E. PSH participants must be re-assessed once per year.

### **Housing Requirements for Permanent Supportive Housing**

- A. PSH programs will provide a living environment that is safe and accessible, offer supportive services, and encourage maximum independence.
- B. PSH programs will ensure that units occupied by program participants meet the community standards for housing quality. Programs must ensure that units occupied by participants meet HUD Housing Quality Standards.
- C. PSH programs will comply with local regulations and community standards regarding occupancy limits based on unit size.
- D. PSH programs will endeavor to offer as much client choice as possible, regarding type and location of housing.
- E. Where possible, PSH services will be provided in community settings that are readily accessible by public transportation and convenient to shopping and other community services.

### **Service Offerings for Permanent Supportive Housing**

Case Managers will offer case management services throughout each participant's stay in PSH, to assist households to maintain housing stability. Participation in services unrelated to obtaining or maintaining permanent housing is voluntary.

- A. PSH programs, through collaborative arrangement or by referral, must offer services to all clients that are tailored to each client's needs. The level and type of services offered should fully meet each client's identified needs, including but not limited to any of the following:

#### **Housing Support**

- A. Rental assistance
- B. Legal assistance
- C. Information and training regarding tenants' rights and responsibilities
- D. Education and assistance around landlord-tenant relationships

#### **Socialization & Daily Functions**

1. Daily living skills training
2. Budgeting and money management skills and training
3. Skills and training in maintaining a household
4. Eligibility screening for, and assistance applying for and retaining mainstream resources (SSI, CalWORKS, MediCal, veterans' benefits, etc.)
5. Vocational and employment assistance or training
6. Supportive employment and referral for employment
7. Interpersonal communication skills
8. Transportation
9. Child care



10. Parenting information and education
11. Conflict resolution
12. Helping clients connect to meaningful daily activities
13. Social, cultural, or recreational activities
14. Opportunities for peer-to-peer education and support
15. Support groups; and other services to maintain, preserve, and promote independence, including optimal physical, social, and psychological development and functioning

**Wellness**

1. Service coordination
  2. Mental health counseling and education
  3. Substance abuse education and counseling
  4. Effective use of health care (medical/ dental/mental health/psychiatric)
  5. Preventive health services
- B. Case managers will offer case management contact with clients at least one time per month.
- C. PSH programs are encouraged to maintain a client to case manager ratio at a level sufficient to ensure the success of the clients.
- D. PSH programs will adopt a housing first approach and take all reasonable steps to reduce barriers to housing, including working with landlords to limit the criteria used to exclude applicants or evict participants. Unless required by law or as a condition of a particular source of funding, programs will not screen out or exclude participants based on any of the following:
1. Lack of participation in supportive services or make progress on a service plan;
  2. Having too little or no income;
  3. Refusal to participate in drug tests;
  4. Active or history of substance abuse;
  5. Experience of domestic violence (e.g., lack of a protective order, period of separation, etc.);
  6. Credit or eviction history; or
  7. Failure to participate in a probation or parole program.

**Procedures for Transfer Between Permanent Supportive Housing Programs**

- A. **Transfers Within the Continuum of Care and Across Continuum of Care Geographic Borders**
1. Transfers from one Permanent Supportive Housing program to another Permanent Supportive Housing program can be made so long as the individual or family meets the eligibility criteria under the specific program and the requirements for the Permanent Supporting Housing project in the Notice of Funding Availability (NOFA) for the year the project was awarded.
  2. Requests for transfer between Permanent Supportive Housing programs will be reviewed and facilitated within the Coordinated Entry system.

3. To assist the facilitation of a transfer, the provider from the transferring program should submit a request to transfer through the Coordinated Entry system, and provide information about eligibility and reason for transfer.

**B. Transfers Related to Domestic or Intimate Partner Violence or Stalking**

(See “Emergency Transfer” above in the “Prioritization” section for more details)

1. When a resident of Permanent Supportive Housing requests a transfer related to domestic or intimate partner violence or stalking, the Coordinated Entry system will prioritize that transfer.
2. Program staff of the transferring program will ensure that the person who experienced domestic or intimate partner violence has access to appropriate services in accordance with the Domestic Violence/Privacy Policies contained within these written standards.

**Procedures for Transfer from One Program Model to Another**

**A. Rapid Rehousing to Permanent Supportive Housing**

1. Transfers from Rapid Rehousing to Permanent Supportive Housing can be made so long as the individual or family meets the eligibility criteria under the specific program and the requirements for the Permanent Supporting Housing project in the Notice of Funding Availability (NOFA) for the year the project was awarded.
2. Individuals or families maintain their chronically homeless status for the purposes of eligibility for other Permanent Supportive Housing during the period that they are receiving the Rapid Rehousing assistance.
3. Requests for transfer between Rapid Rehousing and Permanent Supportive Housing programs will be reviewed and facilitated within the Coordinated Entry system.
4. To assist the facilitation of a transfer, the provider from the transferring program should submit a request to transfer through the Coordinated Entry system and provide information about eligibility and reason for transfer.

**B. Permanent Supportive Housing to Rapid Rehousing**

1. Program transfers may be made from Permanent Supportive Housing to Rapid Rehousing so long as the household meets all eligibility criteria under the specific program and requirements for the Rapid Rehousing project in the Notice of Funding Availability (NOFA) for the year the project was awarded.
2. Requests for transfer between Permanent Supportive Housing and Rapid Rehousing programs will be reviewed and facilitated within the Coordinated Entry system.
3. To assist the facilitation of a transfer, the provider from the transferring program should submit a request to transfer through the Coordinated Entry system, and provide information about eligibility and reason for transfer.

**RAPID REHOUSING (RRH)****Structure of Rapid Rehousing Assistance**

The structure of Rapid Rehousing (RRH) assistance encourages providers to provide the least amount of assistance to individuals and families to ensure their housing stability. RRH provides access to program participants without preconditions.

**A. Goals of Assistance**

1. Rapid Rehousing is designed to allow individuals and families receiving assistance to remain stably housed after the conclusion of such assistance. The goal of RRH is to end homelessness and move participants to permanent housing as quickly as possible, regardless of other personal issues or concerns.
2. The goal is for households to “graduate” from the program once they no longer meet the eligibility requirements of the program’s funding source and/or a Case Manager determines assistance can be terminated, whichever comes first. Assistance ends at 24 months (or earlier time as set by the program).

**B. Subsidy Amount/Length of Time/Calculation**

1. Rental subsidies provided are based on client income. Initial assistance can be as much as 100% of rent depending on client income. Client will pay a percentage of their income in rent based on the program’s assessment of the client’s financial and family situation.
2. Each provider shall verify the participant’s income prior to approval for initial financial assistance. Documentation of the participant’s income and expenses shall be maintained in the participant’s file, as required by 24 CFR § 576.500(e) and 24 CFR § 578.103(a)(6). Income is not a requirement to participate in RRH.
3. For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.
4. The amount or percentage of rent each program participant must pay and the maximum amount or percentage of rental assistance that a program participant may receive is determined on a case-by-case basis. Financial assistance is not a standard “package” and is flexible to adjust to households’ unique needs and resources as participants’ financial circumstances or housing costs change.
5. Rental subsidies will be based on the program’s assessment of the participant’s family and financial situation. Case managers will adjust the amount of contribution over the term of the participant’s participation in the program, based on monthly assessment. If a participant’s income or ability to pay increases (e.g. due to access to additional resources, a new or higher paying job within the household, etc.), the program will re-adjust participant income contributions as necessary.
6. Rental assistance will follow a progressive engagement model (e.g., decrease in assistance based upon the client’s financial and family situation and the program’s discretion).

7. Rental subsidies can be short-term (up to 3 months) or medium-term (3 to 24 months). The length of rental assistance will be determined by each agency as necessary to use resources efficiently while also minimizing returns to homeless.
8. An assessment tool is used regularly to determine the need for ongoing assistance.
9. The CoC may set a maximum number of times that a program participant may receive rental assistance in CoC-funded programs.

**C. Move-In Assistance**

1. Move-In Assistance will be targeted to households who are assessed as able to maintain their unit after the assistance. The amount of move-in assistance is determined by the program, within the limits set by the program's funding source. Move In Assistance may be provided as one time assistance or in tandem with Rental Assistance/Rental Subsidies.

**D. Housing Participants Outside of the CoC's Geographic Area**

1. A program participant may choose to move outside of the CoC's geographic area if the following conditions are met:
  - i. The decision to choose housing or move outside of the CoC's geographic area is made in consultation between the participant and the CoC-funded program.
  - ii. The program has the ability to comply with all CoC program requirements in the geographic area where the housing selected by the participant is selected, including ensuring the housing meets required safety and quality standards, calculating the program participant's income for determining rent contributions, conducting an annual assessment of the participant's service needs, making supportive services available for the duration of the participant's residence in the project, ensuring supportive services are provided in compliance with all State and local licensing codes, and providing monthly case management. The participant must also remain in the HMIS.
  - iii. The only reason the program may decline a participant's request to choose housing or move outside of the CoC's geographic area is that the program cannot reasonably meet all statutory and regulatory program requirements. If the participant's request to move is declined, but the participant believes the provider could have reasonably accommodated the request, the participant may contact the CoC or HUD directly.
  - iv. The CoC where the participant chooses to move is not involved in the decision and may not prohibit individuals from using their rental assistance in the CoC area.
  - v. Moving Survivors of Domestic Violence: With respect to a CoC program participant who is fleeing imminent threat of further harm from domestic violence, the program is exempt from regulatory requirements (such as providing monthly case management for RRH projects and conducting an annual assessment of the service needs of the program participant that has moved), but the program would not be exempt from statutory requirements such as participating in HMIS, ensuring housing meets quality standards, and ensuring the educational needs of children are met.

**E. Services Requirements for RRH Assistance**

1. Case Managers will offer case management services in order to assist households to successfully retain housing and move off the subsidy and into self-sufficiency.
2. During the clients' participation in the program, clients must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. Case management will be offered in a manner consistent with Housing First principles. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient operating the project from making its housing conditional upon the participant's acceptance of services.
3. All clients may receive follow-up services for up to 6 months to ensure housing stability and assess the effectiveness of RRH programs.
4. Participants are provided assistance to locate and obtain permanent housing, financial assistance for move-in and stabilization costs, and housing case management in order to achieve their Housing Plan goals. This includes assistance to address tenancy problems that may jeopardize housing. Assistance is provided:
  - i. Without additional preconditions, such as employment or sobriety; and
  - ii. With understanding that housing may cost greater than 30% of participant income and be precarious.
5. Services may be provided at the program offices, and Case Managers will conduct home visits when appropriate. Services may include, but are not limited to:
  - i. Intake and assessment
  - ii. A minimum of one monthly face-to-face case management meeting
  - iii. A minimum of one quarterly home visit
  - iv. Assistance with transportation, including accompaniment to appointments, home visits
  - v. Assistance, and ongoing assistance, with creating and updating individualized Housing Plans, designed to rehouse and stabilize participants as quickly as possible
  - vi. Verification of progress toward achievement of short- and long-term client objectives
  - vii. Referral to behavioral health resources
  - viii. Job search assistance
  - ix. Benefits assistance and advocacy
  - x. Referral to vocational and training programs
  - xi. Mediation and negotiation with landlords
  - xii. Crisis intervention
  - xiii. Referral to child care resources
  - xiv. Referral to other services and resources
  - xv. Assistance with housing applications
  - xvi. Budgeting and money management assistance
  - xvii. Social and organized activities
6. Participation in services unrelated to obtaining or maintaining permanent housing is **voluntary**.
7. Program participants will be referred to other forms of homeless assistance in the CoC service area according to the Contra Costa County's Coordinated Entry System Policies and Procedures.

### **Eligibility Requirements**

- A. In order to qualify for Rapid Rehousing, households must fall within the target population as well as satisfy the following criteria:
  - 1. The individual or household must meet the definition of homeless under Category 1 or Category 4. For ESG-RRH, an individual or household meeting Category 4 must also live in a place described in Category 1.
  - 2. Other eligibility criteria created at the program level.
- B. Program admission is prioritized for people with the most urgent and severe needs as defined in 25 CCR § 8409.

### **Screening & Assessment**

- A. All referrals to the program, including screening for program eligibility and prioritization, occur according to the Contra Costa County's Coordinated Entry System Policies and Procedures.
- B. All people who are literally homeless who cannot quickly secure housing on their own or with another form of assistance are screened for and offered RRH, to the extent they are eligible, and assistance is available.
- C. Participant assessment focuses on barriers to obtaining and/or maintaining housing (e.g., past rental/credit/criminal history, current income, legal issues, knowledge of tenant rights and responsibilities, etc.).
- D. Programs must conduct participant re-assessments at least annually. At a minimum, re-assessment must establish and document ongoing need and lack of resources and support networks. ESG-funded RRH re-assessments must also demonstrate that the program participant does not have an annual income that exceeds 30% of the median family income for the area.

### **Housing Requirements for Rapid Rehousing**

All housing supported by Rapid Rehousing resources must meet all HUD requirements, including but not limited to, Housing Quality Standards, rent reasonableness standards, FMR (as relevant), environmental review, and others.

### **Best Practices for Rapid Rehousing**

In addition to the requirements related to receiving Rapid Rehousing resources, the CoC encourages providers to implement best practices when locating and securing housing for applicant families. These include:

- A. **Overall Best Practices**
  - 1. Set Goals - from the start, identify and set goals with the household to determine what they want.

2. Set Expectations – review the various rules and regulations related to housing – from noise levels to cleanliness to respect for neighbors. Stress the benefits. Differentiate between the household’s wants versus their needs (e.g. studio serves the purpose rather than a one-bedroom).
3. Set Up Support – have in place counseling and case management during housing process to assist with necessary changes as household transitions into housing (e.g. modifying behaviors that may be viewed negatively in residential settings).
4. Listen to Household – meet regularly, view apartments together, recognize household’s ability to decide where they want to live. Have household take an active role on the search.
5. Recognize What Landlords Want – know what landlords are looking for in prospective tenants (tenants who pay on time, maintain property, get along with others).
6. Address Credit, and Criminal History Issues – educate household on their credit report. Obtain it and review it with household, encourage payment arrangement on utilities to correct discrepancies. Same with criminal history – obtain police records to ensure information is accurate. Work to identify resources to assist household with cleaning up their criminal record.
7. Work with Landlords – work closely with landlord to provide simple, straightforward explanations of a household’s credit/criminal history (face-to-face is best). Once household accepted have landlord and household meet. Prepare household for this first impression (e.g. specific questions the landlord may ask). If household not accepted maintain positive attitude and motivation for possible future opportunity.
8. Understand the Purpose of the Security Deposit – educate the household that the security deposit is a guarantee against damage, not unpaid rent. Meet with the landlord and the client to do an inspection and document/photograph any existing damage and include in household’s file.
9. Review the Lease – review the lease with the household. Emphasize sections on rent, alteration of the apartment, lease violation, rules relating to guests and pets. Identify who is responsible for paying the utilities and any additional charges. Encourage the household to ask questions.
10. Anticipate Challenges – provide and identify support for household who may be experiencing a major transition and adjustments in routines now that they are housed.

**B. Financial Assistance Best Practices**

1. Service providers will not issue checks to anyone other than a property owner or property management company. In no situation should a check or payment be made to household or another party.
2. Service provider should call the landlord to verify the rental agreement.
3. Service providers should mail payment to the property owner and/or property management company. Should the landlord, property owner and/or property management company need the check immediately, they may pick it up from the service provider. The household should not pick-up or deliver the payment to the property owner and/or property management company.

### Staff Requirements

- A. Staff helping participants are aware of and know how to access a wide array of housing options (public/private, subsidized/unsubsidized, all local permanent supportive housing, etc.) to help participants achieve their Housing Plan goals.
- B. Staff are aware of and know how to access other community resources (e.g., legal services, subsidized childcare) that can help participants achieve their housing placement and stabilization goals.

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### EMERGENCY SHELTER (ES)

#### Structure of Emergency Shelter

“Emergency shelter” means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. This includes “day” shelters that meet the definition of “emergency shelter.” In Contra Costa, there are two types of day shelters operating as entry points for Coordinated Entry:

- **CARE Center:** Coordinated Assessment and Resource (CARE) Centers provide a walk-in option for individuals and families who need to connect to homeless services. Services offered include help with basic needs, light case management, housing navigation services and substance use disorder treatment and support.
- **Warming Center:** A facility offering temporary, indoor overnight seating and basic needs services for someone who is homeless; part of the crisis response system.

Contra Costa also has CARE Capable Centers, which expand the geographic coverage of the Coordinated Entry system by co-locating services at existing sites where persons experiencing homelessness access some services. CARE Capable Centers differ from full-service CARE Centers in that they are located at sites that do not exclusively serve individuals and families experiencing homelessness, and may offer a more limited range of homeless services. Because these sites are not dedicated to homelessness, they are not considered day shelters for the purposes of these written standards.

#### A. Goals of Assistance

Shelters provide services coordinated to meet the immediate safety and survival needs of the individual or family served, which may include shelter, food, clothing and other support services. These services are provided in a minimally intrusive environment.

#### B. Duration of Stay

Participants may reside in an emergency shelter for the length of time established by each provider’s program policies and procedures.

#### C. Limitations on Assistance

The total amount of the recipient's fiscal year ESG grant that may be used for street outreach and emergency shelter activities cannot exceed the greater of:

- i. 60 percent of the recipient's fiscal year grant; or



- ii. The amount of Fiscal Year 2010 grant funds committed for homeless assistance activities.

### **Eligibility & Screening**

- A. In order to gain access to emergency shelter services, individuals or families must meet the HUD definition of homeless under Category 1, 2, or 4.
- B. Other eligibility criteria may be created at the program level.
- C. All persons seeking assistance must first be screened to identify whether they should be admitted to a shelter because of their homelessness status, diverted to a provider of other services, or referred for other mainstream resources. Persons who have other safe and appropriate housing options or resources are diverted away from emergency shelter and instead offered problem-solving assistance and immediate linkage to homelessness prevention assistance, as needed, desired, and available.
- D. Evidence of screening for eligibility shall be documented for all persons seeking assistance. The order of priority for obtaining evidence is as follows: third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter or being immediately admitted to shelter or receiving services provided by a victim service provider.
- E. All persons seeking shelter are also screened for critical health and safety needs to identify people with more severe service needs and provide an appropriate response.
- F. Program admission is prioritized for people with the most urgent and severe needs as defined in 25 CCR § 8409.
- G. All referrals to emergency shelter, including screening for program eligibility and prioritization, occur in alignment with Contra Costa County's Coordinated Entry System Policies and Procedures.

### **Assessment & Intake**

- A. Shelters will provide a basic intake within 24 hours of accepting a client into services. Required intake documents, include:
  1. Personal identification: at least one photo ID is preferred. If the client is unable to produce personal identification, the shelter may make a local decision about the necessity of pursuing ID;
  2. Documentation of homelessness status per federal guidelines;
  3. Income self-declaration;
  4. An assessment to determine clients' needs;
  5. HMIS intake forms, except for individuals and households qualifying under Category 4 of HUD's definition of homeless; and
  6. Signed acknowledgement of receiving program rules or requirements.

## CONTRA COSTA WRITTEN STANDARDS FOR PROVIDING COC AND ESG ASSISTANCE

- B. Shelters are prohibited from denying assistance to clients if they refuse to permit the shelter to share their information with other providers. In cases where a client does not consent to having their information shared, the information must still be collected by the shelter to determine eligibility, but it must not be shared via the HMIS if the program client objects.
- C. Comprehensive assessments of admitted shelter program residents shall be conducted within one week of basic HMIS intake.
- D. Program participants will be regularly reassessed throughout their stay at a shelter to determine the earliest possible time that a resident can be discharged to permanent housing.
- E. Shelters shall conduct a full assessment of residents before they leave the shelter.
- F. Program participants will be referred to other forms of homeless assistance in the CoC service area according to the Contra Costa County's Coordinated Entry system procedures.

### **Service Offerings**

The following services may be provided with ESG funds (subject to the limitations in 24 CFR § 576.102):

1. Case management (including developing an individualized housing and service plan that outlines a path to permanent housing stability)
2. Child care
3. Education Services
4. Employment assistance and job training
5. Outpatient health services
6. Legal services
7. Life skills training
8. Mental health services
9. Substance abuse treatment services
10. Transportation

### **Access to Shelter**

- A. Notwithstanding restraints on program capacity and resource limitations, shelters shall follow a Housing First model with low barrier admission policies.
- B. A shelter may turn away a prospective participant if:
  1. The shelter has no availability. If admission otherwise would be appropriate, the shelter may, at its discretion, provide one night of shelter or place the client in a motel, prior to referring them back to the coordinated entry system.
  2. The household includes a child under the age of 18 and the provider operates a single adult shelter.
  3. Agreement with a legal guardian or appropriate authorities has not been secured for an unaccompanied minor.

- C. A shelter may not turn away an individual or family qualifying under Category 4 of HUD's definition of homeless except directly to a mutually agreed upon, more specialized referral, suggested by a Coordinated Entry system entry point, via a "warm" hand-off with a phone call and transportation; or via other mutually agreed upon safe transition protocol.
- D. Per federal requirements, the age and gender of a child under 18 cannot be used as a basis for denying any family's admission to a shelter.
- E. Shelters serving children must check adult names with the State sex offender registry before allowing entry. Single-gender adult shelters may accept sex offenders registered according to Sex Offender Registration Act (California Penal Code 290). Offenders will be asked to make legally required disclosures and will be advised of youth programs in the vicinity so they can stay in compliance with requirements.
- F. Having an outstanding warrant does not disqualify a person from entering a shelter. Shelters may provide a voluntary program to help resolve outstanding warrants.

#### **Discharge from Shelter**

Participants are required to exit shelter at the end of their program-defined length of stay or if they are offered permanent housing. Extensions may be granted according to program policies and procedures.

#### **Shelter Program & Staff Requirements**

The following standards apply to emergency shelters with overnight sleeping accommodations. Day shelters (defined above) may offer a more limited array of these services.

- A. Shelters shall be in operation 24 hours a day, 7 days a week.
- B. Shelters will offer meals.
- C. Shelters shall make every effort to ensure that their services are accessible and appropriate for individuals and families with the highest level of vulnerability.
- D. Shelters should attempt to provide accommodations which protect the family unit whenever possible, allowing parents and children to be accommodated together.
- E. Staff supervision, whether paid or volunteer, must be provided during the hours of operation.
- F. Staff are aware of and know how to access other community resources (e.g., legal services) that can help participants achieve their housing placement and stabilization goals.
- G. Staff helping to re-house participants are aware of and know how to access a wide array of housing options (public/private, subsidized/unsubsidized, all local permanent supportive housing, etc.) directly or through Contra Costa County's Coordinated Entry system to help participants achieve their Housing Plan goals.

## HOMELESS PREVENTION (HP)

### Structure of Homeless Prevention Assistance

Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR § 576.105, the short-term and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400.

#### A. Goals of Assistance

Homeless prevention is designed to allow individuals and families receiving assistance to remain stably housed after the conclusion of such assistance.

#### B. Assistance Amounts and Limitations

1. Funds can be used for a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
2. No written lease for the rental unit is required if the assistance is solely for rental arrears.

### Eligibility Requirements

- A. To receive assistance, an individual or family must meet the criteria under the “at risk of homelessness” definition, or meet the criteria for one of the following categories: (2) Imminent Risk of Homelessness, and (4) Fleeing/Attempting to Flee Domestic Violence; AND has an annual income below 30 percent of median family income for the area, as determined by HUD.
- B. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help a participant regain stability in the participant's current permanent housing or move into other permanent housing and achieve stability in that housing.
- C. Other eligibility criteria may be created at the program level.

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## STREET OUTREACH (SO)

### Structure of Street Outreach Assistance

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

#### A. Goals of Assistance

Street outreach seeks to engage, case manage, and provide mental and physical health support to unsheltered homeless in order to connect them to shelter and support services.

#### B. Assistance Limitations

1. The total amount of the recipient's fiscal year ESG grant that may be used for street outreach and emergency shelter activities cannot exceed the greater of:
  - i. 60 percent of the recipient's fiscal year grant; or
  - ii. The amount of Fiscal Year 2010 grant funds committed for homeless assistance activities.

2. If the recipient or subrecipient is a unit of general purpose local government (any city, county, town, township, parish, village, or other general purpose political subdivision of a State), its ESG funds cannot be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit. See 24 CFR § 576.101(c) for more details.

### **Eligibility Requirements**

In order to receive street outreach assistance, individuals or families must meet the unsheltered HUD definition of homeless within Category 1. “Unsheltered homeless” means an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

### **Service Offerings**

The following services may be provided with ESG funds (subject to the limitation in 24 CFR § 576.101):

1. Engagement
2. Case management
3. Emergency health services
4. Emergency mental health services
5. Transportation
6. Services for special populations (e.g. homeless youth, domestic violence victims, people living with HIV/AIDS)

## **POLICIES AND PROCEDURES**

The following policies and procedures are mandated by Interim Regulations:

### **PARTICIPATION IN HMIS**

- A. All CoC- and ESG-funded projects must ensure that data on all persons served and all activities provided under these federally funded programs are entered into HMIS, in accordance with HUD’s standards on participation, data collection, and reporting under a local HMIS. Victim service providers may use a comparable database, independent from HMIS.
- B. Data associated with anyone who is fleeing or suffering from any form of domestic violence – including dating violence, stalking, trafficking, sexual assault, or youth with a perceived threat of violence due to their gender or sexual orientation-must receive additional safeguards. HMIS cannot be used to collect data from survivors of domestic violence because the Violence Against Women Act (VAWA) restricts HMIS’ ability to track this information to protect this subpopulation’s privacy and to ensure safety. Instead, a parallel database maintained by trained users control these data.
- C. Programs should additionally adhere to requirements outlined in Contra Costa County’s CoC-HMIS Governance Charter, Policies & Procedures.

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PARTICIPATION IN COORDINATED ENTRY

The CoC has established a Coordinated Entry System in compliance with ESG regulations, 25 CCR 8409; HUD Coordinated Entry Notices CPD-17-01 and CPD-16-11; VAWA Reauthorization Act of 2013; and the CoC Program Interim Rule, 24 CFR Part 578. All CoC- and ESG-funded programs are required to participate in this system. All referrals to CoC- and ESG-funded programs, including screening for program eligibility and prioritization, occur according to Contra Costa County CoC's Coordinated Entry System protocols.

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EDUCATION POLICIES

Consistent with the CoC Program Interim Rule 24 CFR §578.23, all CoC and ESG programs assisting families with children or unaccompanied youth must:

- A. Take the educational needs of children into account when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.
- B. Inform families with children and unaccompanied youth of their educational rights, including providing written materials, help with enrollment, and linkage to McKinney Vento Liaisons as part of intake procedures.
- C. Not require children and unaccompanied youth to enroll in a new school as a condition of receiving services.
- D. Allow parents or the youth (if unaccompanied) to make decisions about school placement.
- E. Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
- F. Post notices of student's rights at each program site that serves homeless children and families in appropriate languages.
- G. Designate staff that will be responsible for:
  - 1. Ensuring that homeless children and youth in their programs are in school and are receiving all educational services they are entitled to.
  - 2. Coordinating with the CoC, the Department of Social Services, the County Office of Education, the McKinney Vento Coordinator, the McKinney Vento Educational Liaisons, and other mainstream providers as needed.
- H. In order to ensure compliance and to assist providers in meeting these requirements, the CoC will provide training on these issues annually and will include these in the funding competition review and ranking process.

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#### FAMILY ADMISSION/SEPARATION POLICIES

- A. Consistent with the CoC Program Interim Rule §578.93, neither CoC nor ESG program-funded projects may involuntarily separate families: The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds. The gender and marital status of a parent or parents may also not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds.
- B. The CoC will work closely with providers to ensure that placement efforts are coordinated to avoid involuntary family separation, including referring clients for the most appropriate services and housing to match their needs.
- C. Any client that believes that they or a family member has experienced involuntary separation may report the issue to the CoC. The CoC will investigate the claim and take appropriate remedial action.

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#### HOUSING FOR SPECIFIC SUBPOPULATIONS

**All CoC-funded programs** may exclusively serve a particular homeless subpopulation if the housing addresses a need identified by the Continuum of Care for the geographic area and meets one of the following:

- A. The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex;
- B. The housing may be limited to a specific subpopulation, so long as admission does not discriminate against any protected class under federal non-discrimination laws in 24 CFR 5.105 (*e.g.*, the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless persons and families).
- C. The housing may be limited to families with children.
- D. If the housing has in residence at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the project so long as the child resides in the housing.
- E. If the housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, the housing may be limited to that sub-population (*e.g.*, housing also assisted with funding from the Housing Opportunities for Persons with AIDS program under 24 CFR part 574 may be limited to persons with acquired immunodeficiency syndrome or related diseases).
- F. Programs may limit admission to or provide a preference for the housing to subpopulations of homeless persons and families who need the specialized supportive services that are provided in the

housing (*e.g.*, substance abuse addiction treatment, domestic violence services, or a high intensity package designed to meet the needs of hard-to-reach homeless persons). While the housing may offer services for a particular type of disability, no otherwise eligible individuals with disabilities or families including an individual with a disability, who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

**For ESG-funded** Rapid Rehousing and Homelessness prevention activities, no subpopulation targeting will be permitted except if documentation of all of the following is provided to the California Department of Housing and Community Development prior to the award of funds for these activities: (1) that there is an unmet need for these activities for the subpopulation proposed for targeting, and (2) that there is existing funding in the Continuum of Care Service Area for programs that address the needs of the excluded populations for these activities.

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#### PROGRAMS SERVING ONLY HOUSEHOLDS WITH CHILDREN

While it is acceptable for a program to limit assistance to households with children, it may not limit assistance to only women with children. The program must also serve the following family types, should they present, in order to be in compliance with the Equal Access rule:

- i. Single male head of household with minor child(ren); and
- ii. Any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).

In this example, the program would not be required to serve families composed of only adult members and could deny access to these types of families provided that all adult-only families are treated equally, regardless of sexual orientation, marital status, or gender identity.

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#### INVOLUNTARY FAMILY SEPARATION

All CoC- and ESG-funded programs will not use the age and gender of a child under age 18 as a basis for denying any family's admission.

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#### NONDISCRIMINATION AND EQUAL OPPORTUNITY

All CoC- and ESG-funded programs shall comply with applicable civil rights laws, including the nondiscrimination and equal opportunity requirements in the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act. Further, in providing services and outreach activities related to such services, all programs will not discriminate against a program participant or prospective program participant on the basis of race, color, citizenship, national origin, ancestry, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity or expression, marital status, source of income, genetic information, status as a survivor of domestic violence, or other reasons prohibited by law.

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#### EQUAL ACCESS TO HOUSING

All CoC- and ESG-funded programs must provide equal access to housing, services, and accommodations in accordance with an individual's gender identity. An individual's "gender identity" means the gender



with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person’s perceived gender identity. Programs may not ask intrusive questions about gender or require proof through documentation. Program eligibility must be determined without regard to actual or perceived sexual orientation, gender identity, or marital status. Program policies and procedures must be updated to reflect this.

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AFFIRMATIVELY FURTHERING FAIR HOUSING (OUTREACH)

- A. All CoC- and ESG-funded programs will practice outreach to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identity, sexual orientation, age, familial status, or disability as detailed in 24 CFR 578.93(c) and employ additional efforts to establish effective communication with persons with disabilities and persons with limited English proficiency, working cooperatively with the Coordinated Entry System Manager.
- B. This outreach will consist of affirmative marketing of the program’s housing opportunities and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities.
- C. If programs encounter a condition or action that impedes fair housing choice for current or prospective program participants, programs will provide such information to the CoC Board. Programs will also provide participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws.

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REASONABLE ACCOMMODATION AND DISABILITY-RELATED GRIEVANCE PROCEDURE

Disabled clients may request an accommodation to the program procedures if they are unable to comply with them due to their disability. In order for the client to receive an accommodation, the forms listed below must be completed and submitted to the Program Director for consideration. The client will be notified in writing whether the accommodation will be made, or not, with the reasons included. Please see the appendices for forms labeled “Request for Reasonable Accommodation”, “Request for Consideration of Mitigating Circumstances” and “Verification of Mitigating Circumstances.” All clients have a right to file a grievance, whether disabled or not.

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MAINSTREAM BENEFITS

All CoC- and ESG-funded programs will receive information and training from the Contra Costa County CoC regarding projects to supplement CoC program funds with resources from other public and private funding sources, including, mainstream programs that assist participants in applying for and receiving mainstream benefits. Program staff will be kept systematically up-to-date regarding mainstream resources available for program participants (e.g., Food Stamps, SSI, TANF, substance abuse programs) within the Contra Costa County CoC area.

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**DOMESTIC VIOLENCE/PRIVACY POLICIES**

All efforts shall be made to protect the privacy and safety of domestic violence survivors and to uphold client choice by presenting a range of housing and service options. The following procedures are in place to do that.

**Privacy and Safety**

- A. Programs which are primarily for survivors of violence are prohibited from contributing client-level data into the HMIS. However, these programs must record client-level data within a comparable internal database and be able to generate aggregate data for inclusion in reports.
- B. Non-victim service providers shall protect the privacy of individuals and families who are fleeing, or attempting to flee violence, by not including intake/treatment data in HMIS.
- C. The location of Domestic Violence shelters/programs shall not be made public.
- D. Staff responsible for coordinated intake/assessment shall receive training on protecting the safety and privacy of individuals who are fleeing, or attempting to flee violence.
- E. For each program participant who moved to a different Continuum of Care due to imminent threat of further violence under § 578.51(c)(3), the CoC program must retain:
  1. **Documentation of the original incidence of violence.** This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.
  2. **Documentation of the reasonable belief of imminent threat of further violence, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence.** This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household.

**Services Requirement Exemption for Survivors of Domestic Violence**

Programs are exempt from the services requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the program from making its housing conditional upon the participant's acceptance of services.

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DRUG FREE WORKPLACE

All CoC- and ESG-funded programs will certify that they operate in accordance with the Drug-Free Workplace Act of 1988 (41 U.S.C. 701, *et. seq.*) and HUD's implementing regulations at 2 CFR § 2429. All programs shall notify HUD about any employee's conviction for a criminal drug offense pursuant to HUD-50070.

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ANTI-LOBBYING

- A. All CoC- and ESG-funded programs are prohibited from using appropriated funds for lobbying the executive or legislative branches of the Federal Government in connection with a specific contract, grant, or loan.
- B. All CoC- and ESG-funded programs shall disclose, using Standard Form LLL (SFLLL), "Disclosure of Lobbying Activities," any funds other than federally appropriated funds, that will be or have been used to influence federal employees, Members of Congress, or congressional staff regarding specific contract, grant, or loans.
- C. As an applicant for future funds, programs shall submit the SFLLL if it has used or intends to use federal funds for lobbying activities.

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COMPLIANCE WITH SECTION 3 OF THE HOUSING AND URBAN DEVELOPMENT ACT OF 1968

Employment and other economic opportunities generated by federal financial assistance for housing and community development programs shall, to the greatest extent feasible, be directed toward low- and very low-income persons, particularly those who are recipients of government assistance for housing.

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SOLID WASTE DISPOSAL ACT

All CoC- and ESG-funded programs will comply with the requirements of Section 6002 of the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act, in the procurement of certain items and services as follows. Programs will:

1. Procure items designated in guidelines of the EPA at 40 CFR part 247 that contain the highest percentage of recovered materials practical, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired in the preceding fiscal year exceeded \$10,000;
2. Procure solid waste management services in a manner that maximizes energy and resource recovery; and
3. Establish an affirmative procurement program for the procurement of recovered materials identified in the EPA guidelines.

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RELOCATION DUE TO PROGRAM CLOSURE

- A. In the event that a program is closing its doors, the program should contact the local HUD field office. These entities should work together to develop a plan for transitioning the participants to

## CONTRA COSTA WRITTEN STANDARDS FOR PROVIDING COC AND ESG ASSISTANCE

other permanent housing. HUD expects that programs that are closing, in partnership with the CoC, will take a client-centered, proactive approach to ensure consistency of appropriate housing for program participants after the program closes.

- B. Program participants that are receiving assistance through programs such as the Emergency Solutions Grants (ESG) Program, the Continuum of Care (CoC) Program, the Supportive Services for Veterans Families (SSVF) Program, or the Veterans Homelessness Prevention Demonstration Program (VHPD) maintain their homeless status for the purpose of eligibility for other permanent housing programs, such as HUD-VASH and CoC-funded permanent supportive housing (so long as they meet any other additional eligibility criteria for these programs). Program participants only maintain their homeless status during the time period that they are receiving the rapid re-housing assistance.

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### PROGRAM POLICIES AND PROCEDURES

All CoC- and ESG-funded programs will establish and maintain standard operating procedures that adhere to CoC and ESG requirements, including but not limited to recordkeeping, as outlined in 24 CFR §§ 578.103 and 576.500 respectively.

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### NOTICE OF FUNDING AVAILABILITY (NOFA) REQUIREMENTS BY GRANT YEAR

All CoC- and ESG-funded programs must additionally adhere to any requirements stated in the NOFA (or RFP) for the grant year in which they are operating. At times, HUD places additional requirements for the use of a funding source that may alter who can be served, how funds can be spent, and other activities.

### MONITORING AND EVALUATION OF RECIPIENTS AND SUBRECIPIENTS

The CoC Interim Regulations (24 CFR § 578.7(a)) mandate that the Continuum of Care do the following:

- A. Consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers; and
- B. Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report to HUD.

### PARTICIPANT TERMINATION AND APPEALS POLICY

If a client violates program requirements or no longer meets minimum eligibility requirements for assistance, the program may terminate assistance. Program policies and procedures must outline the termination and appeals process. These policies and procedures must be given to the participant at program entry and at the time of termination.

- A. To terminate assistance, the minimum required formal process must consist of:
  - 1. A written notice to the client containing a clear statement of the reasons for termination; and







## CONTRA COSTA WRITTEN STANDARDS FOR PROVIDING COC AND ESG ASSISTANCE

2. A review of the decision, in which the client is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
  3. Prompt written notice of the final decision to the client.
- B. Termination does not bar the program from providing further assistance at a later date to the same family or individual if they so wish.
- C. Participants who seek to appeal an unfavorable decision by the program may contact the Contra Costa Council on Homelessness for a review of the decision.

**APPENDICES**

**A: CHRONIC HOMELESSNESS DOCUMENTATION CHECKLIST**

**Chronic Homelessness Definition**

<b>Recordkeeping Documentation Options Explained</b>			
<b>3<sup>rd</sup> Party Documentation</b>			
	<p>Documentation from HMIS/Comparable Database</p> <p><i>Records must show entries/exits at Shelters.</i></p> <p><i>An answer of "Yes" to the question as to whether the individual is chronically homeless (Universal Data Element 3.917) is not sufficient.</i></p>	<p>Written observation by an outreach worker or</p> <p>Written referral by another housing or service provider</p>	<p>Documentation from Institutions like Hospitals, Correctional Facilities, etc.</p> <p><i>Must include records about stay the length of stay, signed by Clinician or other appropriate staff.</i></p>
<b>Self Certification</b>		<p>Signed certification by the individual seeking assistance describing how they meet the definition, which must be accompanied by the intake worker's documentation of the living situation and the steps taken to obtain evidence to support it.</p> <p>Remember that for each Project:</p> <ul style="list-style-type: none"> <li>• 100% of households served can use self-certification for 3 months of their 12 months,</li> <li>• 75% of households served need to use 3<sup>rd</sup> Party documentation for 9 months of their 12 months, and</li> <li>• 25% of households served can use self-certification as documentation for any and all months.</li> </ul>	
<p><b>When do you need third party documentation?</b></p> <p style="margin-left: 20px;">  Preferred to record all occasions of homelessness to document Chronic Homelessness.                 </p> <p style="margin-left: 20px;">  Not necessary to record breaks in homelessness, these can be based on self reports.                 </p>			

**Chronic Homelessness Documentation Checklist**

*An individual is defined by HUD as “Chronically Homeless” if they have a disability and have lived in a shelter, safe haven, or place not meant for human habitation for 12 continuous months or for 4 separate occasions in the last three years (must total 12 months). Breaks in homelessness, while the individual is residing in an institutional care facility will not count as a break in homelessness. Additionally, an individual who is currently residing in an institutional care facility for less than 90 days and meets the above criteria for chronic homelessness may also be considered chronically homeless. Lastly, a family with an adult/minor head of household who meets the above mentioned criteria may also be considered chronically homeless, despite changes in family composition (unless the chronically homeless head of household leaves the family).*

<b>Client Name:</b>	<b>Date of Birth:</b>
<b>Number in Household:</b>	<b>Client Head of Household:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Part 1: Current Housing Status</b>	
<p><i>Client must currently be in one of these locations in order to be considered chronically homeless.</i></p> <p><b>Client is currently residing:</b></p> <p><input type="checkbox"/> In Emergency Shelter</p> <p><input type="checkbox"/> On the Streets/Place not Meant for Human Habitation</p> <p><input type="checkbox"/> In the Safe Haven</p> <p><input type="checkbox"/> In an Institutional Care Facility (Where they have been for fewer than 90 days)</p>	
<b>Start Date:</b> _____	<b>End Date:</b> _____
<b>Location Name/Address:</b>	
<b>Current Housing Status Notes:</b>	
<b>Chronic Homelessness Documentation Checklist - Page 1 of 4 (Not including Attachments)</b>	

CONTRA COSTA WRITTEN STANDARDS FOR PROVIDING COC AND ESG ASSISTANCE

Part 2: Housing History													
	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	
Mo./Yr.													
Location	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)	<input type="checkbox"/> Streets <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Inst. (<90 days)
Doc. Type	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence	<input type="checkbox"/> HMIS <input type="checkbox"/> Obsv. By Outreach <input type="checkbox"/> Comp. Database <input type="checkbox"/> Discharge Paperwork <input type="checkbox"/> Referral <input type="checkbox"/> Self-Cert. <input type="checkbox"/> Staff Doc. of Situation <input type="checkbox"/> Doc. of steps to obtain evidence
Doc. Att.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Break Mo./Yr. & Descr. or N/A	Break 1: Break 2: Break 3: If there are additional breaks please detail and attach.												
Notes													
Self-Cert. Check	Does the documentation include more than 3 Months of Self-Certifications? * <input type="checkbox"/> Yes <input type="checkbox"/> No * Please be advised that if you answered YES, that for at least 75% of the households assisted by a recipient in a project during an operating year, no more than 3 months can be self-certified. Please check with you project administrator to ensure your project has not exceeded its self-certification cap.												
Key	Mo. = Month, Yr. = Year, Inst. = Institution, Doc. = Documentation, Obsv. = Observation, Comp. = Comparable, Cert. = Certification, Descr. = Description												
<b>Chronic Homelessness Documentation Checklist - Page 2 of 4 (Not including Attachments)</b>													



**Part 3: Disability Status**

*The term homeless individual with a disability' means an individual who is homeless, as defined in section 103, and has a disability that*

- *Is expected to be long-continuing or of indefinite duration;*
  - *Substantially impedes the individual's ability to live independently;*
  - *Could be improved by the provision of more suitable housing conditions; and*
  - *Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury;*
- *Is a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or*
- *Is the disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.*

The head of household has been diagnosed with one or more of the following (check all that apply):

- Substance use disorder
- Serious mental illness
- Developmental disability
- Post-traumatic stress disorder
- Cognitive impairments resulting from brain injury
- Chronic physical illness or disability
- Other:

Documentation Attached:

- Written verification of the disability from a licensed professional;
- Written verification from the Social Security Administration;
- The receipt of a disability check; or
- Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by supporting evidence.

**Disability Notes:**

<b>Part 4: Staff and Client Certifications</b>		
<p><b>Client Certification:</b></p> <p><i>To the best of my knowledge and ability, all the information provided in this document is true and complete. I also understand that any misrepresentation or false information may result in my participation being cancelled or denied, or in termination of assistance. It is my responsibility to notify _____ of any changes in my housing status or address in writing during program participation and I understand that my application may be cancelled if I fail to do so.</i></p>		
<b>Client Name: (Printed)</b>	<b>Client Signature:</b>	<b>Date:</b>
<p><b>Staff Certification:</b></p> <p><i>To the best of my knowledge and ability, all of the information and documentation used in making this eligibility determination is true and complete.</i></p>		
<b>Staff Name: (Printed)</b>	<b>Staff Signature:</b>	<b>Date:</b>
<b>Staff Role:</b>	<b>Agency:</b>	
<b>Notes:</b>		
<b>Chronic Homelessness Documentation Checklist - Page 4 of 4 (Not including Attachments)</b>		

**B: DISABILITY CERTIFICATION**

1. Name of Client: \_\_\_\_\_

The above named individual is a client of the \_\_\_\_\_ program. As required by the US Department of Housing and Urban Development (HUD), we must verify the following self-reported disabilities before entering this information into the Homeless Management Information System: Mental health issues, chronic health conditions, physical/medical conditions, developmental disabilities. A disability as defined by HUD is as follows:

- (1) a disability as defined in Section 223 of the Social Security Act;
- (2) a physical, mental, or emotional impairment which is (a) expected to be of long, continued and indefinite duration, (b) substantially impedes an individual’s ability to live independently, and (c) of such a nature that such ability could be improved by more suitable housing conditions.
- (3) a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act;
- (4) the disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for acquired immunodeficiency syndrome; OR
- (5) a diagnosable substance abuse disorder.

**Other Definitions:**

- *Mental Health Problem* – a mental health condition that is expected to be of long-continued and indefinite duration and may substantially impede a client’s ability to live independently. A mental health problem may include serious depression, serious anxiety, hallucinations, violent behavior or thoughts of suicide.
- *Chronic Health Condition* - a diagnosed condition that is more than three months in duration and is either not curable or has residual effects that limit daily living and require adaptation in function or special assistance. Examples of chronic health conditions include, but are not limited to, heart disease (including coronary heart disease, angina, heart attack and any other kind of heart condition or disease); severe asthma; diabetes; arthritis-related conditions (including arthritis, rheumatoid arthritis, gout, lupus, or fibromyalgia); adult onset cognitive impairments (including traumatic brain injury, post-traumatic distress syndrome, dementia, and other cognitive related conditions); severe headache/migraine; cancer; chronic bronchitis; liver condition; stroke; or emphysema.
- *Physical/Medical* -a physical impairment which is (a) expected to be of long, continued and indefinite duration, (b) substantially impedes an individual’s ability to live independently, and (c) of such a nature that such ability could be improved by more suitable housing conditions.
- *Developmental* - a severe, chronic disability that is attributed to a mental or physical impairment (or combination of physical and mental impairments) that occurs before 22 years of age and limits the capacity for independent living and economic self-sufficiency.

2. Please indicate the type of disability that is being verified (you may check more than one) and sign below to certify that the individual meets HUD’s definition of said disability. Certification must be signed by a qualified licensed professional.

- Mental Health Problem: \_\_\_\_\_
- Physical/Medical: \_\_\_\_\_
- Chronic Health Condition: \_\_\_\_\_
- Developmental

Signature 1	Date	License No and License Type
Signature 2	Date	License No and License Type

C: REQUEST FOR REASONABLE ACCOMMODATION

Name \_\_\_\_\_ Phone \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ ZIP \_\_\_\_\_

The following member of my household has a disability. "Disability" is defined as having a physical or mental impairment that substantially limits one or more major activities, a record of having such an impairment, or being regarded as having such an impairment.

Name of Person with Disability \_\_\_\_\_

As a result of the disability, the person listed above requires the following change(s) be made to the existing residence:

- A modification to the residence or a modification to the housing complex. Describe the change requested:
  
- A change to a rule, policy or procedure. Describe the change requested:

The reasonable accommodation is needed so that the person with the disability can:

To verify the disability and need for accommodation, you may contact the following person:

Name and Relationship \_\_\_\_\_

Address \_\_\_\_\_

Phone \_\_\_\_\_

I give \_\_\_\_\_ permission to contact the above individual for purposes of verifying that I or a household member has a disability and requires the reasonable accommodation described above. I understand that the information you obtain will be kept completely confidential and used solely to determine necessity for reasonable accommodation.

Signature \_\_\_\_\_ Date \_\_\_\_\_

D: REQUEST FOR CONSIDERATION OF MITIGATING CIRCUMSTANCES

Applicant/Tenant Name \_\_\_\_\_ Phone \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ ZIP \_\_\_\_\_

I have a disability. I am submitting this request because my application was rejected, I received a lease violation or I received an eviction notice due to circumstances resulting from my disability.

1. Describe why you believe the problem was a result of the disability.
2. Describe why the problem is not likely to happen again.
  - The following circumstances have changed.
  - A request for reasonable accommodation has been approved. (Describe the accommodation or attach a request form.
3. To verify the disability, you may contact the following person:

Name and Relationship \_\_\_\_\_  
Address \_\_\_\_\_  
Phone \_\_\_\_\_

4. To verify that the problem is not likely to reoccur, you may contact the following person:

Name and Relationship \_\_\_\_\_  
Address \_\_\_\_\_  
Phone \_\_\_\_\_

5. To verify that the reasonable accommodation request is necessary and likely to solve the problem, you may contact the following person:

Name and Relationship \_\_\_\_\_  
Address \_\_\_\_\_  
Phone \_\_\_\_\_

I give \_\_\_\_\_ permission to contact the above individuals for purposes of verifying the information described on this form. I understand that the information you obtain will be kept completely confidential.

Signature \_\_\_\_\_

Date \_\_\_\_\_

E: VERIFICATION OF MITIGATING CIRCUMSTANCES

In signing this form, I verify the following information regarding the individual:

Name \_\_\_\_\_

The individual was denied services, received a lease violation or an eviction notice due to circumstances resulting from a disability. Describe the reason one or more of these occurred.

The problem is not likely to reoccur because of the following changes. Describe the changes and explain your reasoning.

The problem is not likely to reoccur if the individual is provided the following reasonable accommodation. Describe the reasonable accommodation and explain your reasoning.

Name and Title \_\_\_\_\_

Relationship to Named Individual \_\_\_\_\_

Address \_\_\_\_\_ Phone \_\_\_\_\_