



## **Continuum of Care Written Standards**

The Mid-Alabama Coalition for the Homeless is the Continuum of Care (CoC) responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of Montgomery, Autauga, Bullock, Elmore and Lowndes Counties, Alabama. Both the Emergency Solution Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules state that the Continuum of Care (CoC), in consultation with recipients of Emergency Solutions Grants program funds within the geographic area, (1) establish and consistently follow written standards for providing Continuum of Care assistance, (2) establish performance targets appropriate for population and program type, and (3) monitor recipient and sub-recipient performance.

All programs that receive CoC funding and operate within the MACH-designated counties are required to abide by these written standards. 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 permanent housing.

The Continuum of Care Written Standards will include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance;

The CoC Written Standards have been approved by the CoC board. The Written Standards will be reviewed and revised as needed but at least annually. Agreement to abide by the Written Standards will be a condition of accepting CoC funding.

**I. PROGRAM REQUIREMENTS FOR ALL PROGRAMS**

- Programs must coordinate with other targeted homeless services within the CoC.
- Programs must coordinate with mainstream resources in the CoC including housing, social services, employment, education and youth programs for which participants may be eligible.
- Programs must have written policies and procedures and must consistently apply them to all participants.
- Programs that serve households with children or unaccompanied children of school age must designate a staff person to serve as the educational liaison that will ensure that children are enrolled in school, connected to appropriate services in the community, including early childhood program such as Head Start and the education services available under the McKinney-Vento Homeless Children and Youth Program.
- Programs receiving CoC funding must participate in HMIS (Homeless Management Information System), however all homeless programs are strongly encouraged to participate in HMIS.
  - Programs must meet minimum HMIS data quality standards
  - Programs providing Domestic Violence or Legal Services may opt out of HMIS participation but must utilize a comparable database to collect HUD required data elements
- After allowing for a period of self-resolve, if applicable, programs must conduct a VI-SPIDAT assessment to determine eligibility and the amount and type of assistance needed to regain stability in permanent housing and to place the client on the coordinated assessment priority list.
- Program rules and regulations should be designed in the spirit of inclusion rather than as grounds for denial or termination. Programs should exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- Programs must have a formal procedure for terminating assistance to a participant that recognizes the rights of the participant(s) involved.
  - Programs must use judgment and examine all extenuating circumstances in determining that a violation should result in termination
  - Every effort should be made to allow the participant to remain in the program; termination should only be exercised in the most severe cases.

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- Programs must make known that use of the facilities and services are available to all on a nondiscriminatory basis.
- Programs may not engage in inherently religious activities such as worship, religious instruction or proselytization as part of the programs or services funded under the CoC. These activities can be conducted but must be separate and voluntary for program participants.

### **II. RECORDKEEPING REQUIREMENTS FOR ALL PROGRAMS**

- Participant Recordkeeping Requirements include:
  - All records containing personally identifying information must be kept secure and confidential, and programs must have written confidentiality/privacy notice a copy of which should be made available to participants if requested
  - Documentation of homelessness (following HUDs guidelines)
  - A record of services and assistance provided to each participant
  - Documentation of any applicable requirements for providing services/assistance
  - Documentation of use of coordinated assessment system
  - Documentation of use of HMIS
  - Records must be retained for the appropriate amount of time as prescribed by HUD
- Financial Recordkeeping Requirements include:
  - Documentation for all costs charged to the grant
  - Documentation that funds were spent on allowable costs
  - Documentation of the receipt and use of program income
  - Documentation of compliance with expenditure limits and deadlines
  - Retain copies of all procurement contracts as applicable
  - Documentation of amount, source and use of resources for each match contribution

### **III. TRANSITIONAL HOUSING**

Transitional Housing (TH) facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering TH.

#### **Minimum Standards**

- Participants must meet the HUD definition of homelessness
- Maximum length of stay cannot exceed 24 months
- Assistance in transitioning to permanent housing must be provided

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- Supportive services must be provided throughout the duration of stay in transitional housing
- Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months

### Accessing Transitional Housing Programs

- All referrals for TH programs, other than DV programs, will come through the Coordinated Entry System.
- Each TH program in the CoC will provide accurate and up-to-date information on eligibility criteria for the program; ie. – gender specific, individuals/families.

### Minimum Performance Benchmarks

- 65% or more of all participants will exit to a permanent housing situation
- 55% or more of adult participants will have income from sources other than employment
- 55% or more of all participants have mainstream (non-cash) benefits at exit from program
- 20% or more of adult participants have employment income
- 20% or more of adult participants will increase employment income
- 25% or more of adult participants will increase income from all sources

## **IV. RAPID RE-HOUSING PROGRAMS (RRH)**

Rapid Re-Housing Programs (RRH) provide housing relocation and stabilization services and short or medium term rental assistance as needed to help a homeless individual or family move as quickly as possible to permanent housing and achieve stability in that housing.

### Minimum Standards

- Participants must meet the HUD definition of homelessness
- Maximum participation in a rapid rehousing program cannot exceed 24 months
- Services that must be provided include landlord outreach, assessment of housing barriers, financial assistance, and case management
- Support services must be provided throughout the duration of stay in housing

### Accessing RRH Programs

- 80% of participants will come through the Coordinated Assessment system.

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- Each RRH program in the CoC will provide accurate and up-to-date information on eligibility criteria for the program; and program requirements.

### Minimum Performance Benchmarks:

- 80% or more of all participants remain stable in RRH or exit to a different permanent housing situation
- 55% or more of adult participants will have income from sources other than employment
- 55% or more of adult participants will increase income from sources other than employment
- 55% or more of all participants have mainstream (non-cash) benefits at exit from program
- 20% or more of adult participants have employment income
- 20% or more of adult participants increase employment income

## **V. PERMANENT SUPPORTIVE HOUSING**

Permanent housing is community-based housing, the purpose of which is to provide housing without a designated length of stay.

### Minimum Standards

- Participants must meet the HUD definition of homelessness
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability
- There can be no predetermined length of stay for a PSH program
- Supportive services designed to meet the needs of the program participants must be made available to the program participants throughout the duration of stay in PSH
- Program participants in PSH must enter into a lease agreement for an initial term of at least one year. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months
- Turnover beds in PSH projects will be prioritized for the chronically homeless

### Accessing PSH Programs

- 80% of participants will come through the Coordinated Assessment system.
- Each PSH program in the CoC will provide accurate and up-to-date information on eligibility criteria for the program; ie. – gender specific, individuals/families

### Minimum Performance Benchmarks

- 80% or more of all participants remain stable in PSH or exit to a different permanent housing situation

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- 55% or more of adult participants will have income from sources other than employment
- 55% or more of adult participants will increase income from sources other than employment
- 55% or more of all participants have mainstream (non-cash) benefits at exit from program
- 20% or more of adult participants have employment income
- 20% or more of adult participants increase employment income

### **VI. COORDINATED ASSESSMENT AND PRIORITIZATION**

MACH's has adopted the order of priority prescribed in HUD's Notice CPD-16-011: *Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*. Recipients of CoC-funded PSH are required to follow the order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

Recipients of CoC Program-funded PSH should follow the order of priority below while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority under Section VI.A. of these standards to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC's geographic area, the recipient should follow the order of priority under Section VI.B for persons with a serious mental illness.

#### **A. Order of Priority for CoC-Program funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness**

1. Chronically Homeless Individuals and Families 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.
2. Chronically Homeless Individuals and Families with the Longest Histories Residing in Places not meant for Human Habitation, in Emergency Shelters, and in Safe Havens
3. Chronically Homeless Individuals and Families with the Most Severe Service Needs.
4. All Other Chronically Homeless Individuals and Families.

B. Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness

1. Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs
  2. Homeless Individuals and Families with a Disability with Severe Service Needs
  3. Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters without Severe Service Needs
  4. Homeless Individuals and Families with a Disability Coming from Transitional Housing
- Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described above. HUD and the CoC recognize that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH.
  - Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and these individuals and families must continue to be prioritized until they are housed.
  - The Priority List will be maintained via the HMIS system.
  - Any agency representative may assess a client to be placed on the list.
  - Case Managers will use the VI-SPDAT assessment to determine the vulnerability score.
  - Under no circumstances shall the order of priority be based upon diagnosis or disability type, but instead on the length of time an individual or family has been experiencing homelessness and the severity of needs of the individual or family.
  - MACH will publish further guidelines to distribute to agency staff on the steps for utilizing the Coordinated Assessment system.