South Central Illinois Continuum of Care

HOMELESS PROGRAM STANDARDS

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South Central Illinois Continuum of Care Homeless Program Standards

The U.S. Department of Housing and Urban Development (HUD) via Emergency Solutions Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules requires that Continua of Care (COC) establish and consistently follow written standards for providing Continuum of Care assistance. The South Central Illinois Continuum of Care (SCICoC) has developed these standards to fulfill requirements and to help end homelessness.

SCICoC Homeless Program Standards: Overview

Items addressed in the Program Standards

- Program compliance
- Participation in coordinated entry
- Homeless Program eligibility
- Documentation and recordkeeping
- Personnel in programs
- Implementation of Housing First Practices
- Termination from programs
- PSH prioritization

Issues related to eligible costs/activities within federal and state funding sources, HMIS participation requirements, and performance and reporting requirements are not addressed here.

Standards for All Projects

All project types – DHS, Prevention (HP), Emergency Shelter (ES), Transitional Housing (TH), Rapid Re-housing (RRH), and Permanent Housing (PSH)-must adhere to the standards outlined in the following sections. Where this is some variation in applicability of the standards by project type, those variations will be noted in the project type-specific sections. Although the following standards apply to all SCICoC homeless projects, these standards are not exhaustive in terms of outlining all federal or state homeless program funding requirements, as noted above. All organizations operating homeless projects funded by a state or federal source must ensure they read, understand, and comply with all program regulations.

SCICoC homeless projects funded through HUD's Continuum of Care Program (CoC) must ensure they are operating in compliance with the Part 578 CoC Program Interim rule. Projects funded through Illinois Department of Human Services (IDHS) must ensure they are in compliance with all relevant state regulations.

Serving Families in Homeless Projects

Equal Access

SCICoC homeless projects serving families must ensure they comply with the Equal Access Rule, as outlined by HUD. The Equal Access Rule outlines the federal definition of 'family' for purposes of receiving assistance from certain programs. The definition of 'family' is as follows:

> *Family* includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. SCICoC homeless projects cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. More specifically, SCICoC homeless projects with dedicated family beds/units must serve families, regardless of the marital status or sexual orientation of the adults.

There are some very limited exceptions to this rule, however, for those programs funded through special initiatives under the annual CoC Competition. For example, if your project was funded as a new Rapid Re-Housing (RRH) program in the FY2013 CoC Competition, that Notice of Funding Availability (NOFA) limited RRH eligibility to households with children only. Therefore, RRH projects funded through the FY2013 CoC Competition would be permitted to only serve families with children (excluding households comprised of only adults) because of the more limited requirements placed on them in that year's NOFA.

Keeping Families Intact

SCICoC emergency shelter projects serving families are required to serve the intact family, where desired by the client. Family members, regardless of age, gender, or other factors, cannot be separated from other family members during their program stay.

Serving Transgender Persons in Emergency Shelters and Other Sex-Segregated Facilities

SCICoC emergency shelters must make their resources available to individuals and families without regard to actual or perceived sex, sexual orientation, or gender identity. Although emergency shelters with shared sleeping areas or bathrooms are permitted to inquire about sex or gender identity for purposes of determining room assignment, best practices suggest that where there is uncertainty about sex or gender identity shelter providers should ask where individuals feel most comfortable sleeping. This may mean that the person should be provided with a private changing, shower, and/or sleeping space, or stagger use of facilities so that the person may shower and change alone. Decisions about how and where someone is housed should be made on a case-by-case basis strongly taking into account the person's preference about where to sleep, and keeping safety a priority.

In situations where providers are unsure of a person's sex or gender identity, providers may not ask for documentation of sex or gender. The best way to proceed if a provider is unsure is to tell a client that the agency provides shelter according to the gender with which the client identifies. Do *not* ask, "What is your sex/gender?" *Do* say, "This is a shelter for women, if you would rather be in a different shelter, let us help you find one where you feel safe and comfortable." It is understood that not every facility can accommodate every gender expression. The spirit of this guidance is about helping people to feel safe and comfortable in their temporary accommodations. This may mean telling a client what the local options are, *without* asking about their gender, and doing the most possible to get that person to a place they want to be. Gender-based violence can be inflicted on transgender people and providers are obligated to protect transgender people from such violence the same way they protect women, for example, from violence.

SCICoC emergency shelters and other homeless program providers should review the HUD notice, *Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities,* in order gain a comprehensive understanding of how the notice affects both clients and providers, and guides protocols, policies, and procedures. The notice can be found at https://www.hudexchange.info/resource/4428/notice-cpd-15-02-appropriate-placementfor-transgender-persons-in-single-sex-emergency-shelters-and-other-facilities

Participation in Coordinated Entry

SCICoC homeless projects, regardless of funding source, must participate in the SCICoC Coordinated Entry process and abide by all approved SCICoC Coordinated Entry policies and procedures. This includes, but is not limited to, only accepting clients into homeless projects who have come through the Coordinated Entry process.

Homeless Program Eligibility

Persons served by SCICoC homeless projects must be defined as homeless according to HUD's Homeless definition, as follows:

The Homeless definition is comprised of four categories:

1. Literal homelessness is further defined as homeless individuals/families who lack a fixed, regular and adequate nighttime residence, meaning:
    i. Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, such a place not meant for human habitation
    ii. Living in emergency shelter or transitional housing designated to provide temporary living arrangements (including hotel/motel stays paid for by charitable or government programs)
    iii. Exiting an institution where the individual resided for less than 90 days and where the individual entered the institution immediately from emergency shelter (including hotel/motel stays paid for by charitable or government programs) or an unsheltered location
2. Individuals/families who will imminently (within 14 days) lose their primary nighttime residence with no subsequent residence AND no resources or support networks
3. Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statute and 3 additional criteria (HUD has not granted any SCICoC homeless projects permission to serve households defined as homeless under category 3)
4. Individuals/families fleeing or attempting to flee domestic violence with no subsequent residence AND no resources or support networks

Not all SCICoC homeless projects are permitted to serve people defined as homeless under all four categories of the Homeless definition. Further details regarding eligibility by program type are as follows:

Homeless Prevention

- Can serve persons in Category 2 – Imminent Risk of Literal Homeless
- Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)

- or be defined as at-risk of homeless, according to HUD's At-Risk of Homelessness definition
   Emergency Shelters

- Category 1-Literally Homeless

- Category 2- Imminent Risk of Literal Homelessness

- Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)

Transitional Housing

- Category 1-Literally Homeless

- Category 2- Imminent Risk of Literal Homelessness

- Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)

Rapid Re-housing

 RRH projects are further limited to serving category 1 homeless who are residing in emergency shelters or in unsheltered locations only

Permanent Supportive Housing

- Category 1- Literally Homeless

- Category 4 – Fleeing/Attempting to Flee Domestic Violence (CV)

- PSH project clients must be disabled and this must be documented appropriately.

- More detailed information and official HUD guidance on the homeless definition and program eligibility can be found at https://hudexchange.info/coc/coc-program-lawregulations-and-notices/.

Documentation and Recordkeeping Requirements

All SCICoC homeless projects maintain standard operating procedures for ensuring that state and federal program funds are used in accordance with all requirements. These procedures should include maintaining sufficient agency and client records.

Organizational Recordkeeping Requirements

SCICoC homeless projects must maintain the following records at the organizational level:

- Standard Operating Procedures – maintain procedures for ensuring that program funds are used in accordance with all applicable requirements

- Conflict of Interest Policies – maintain conflict of interest policies ; organizational, or funding entity conflict of interest requirements

- Homeless Consumer Participation – maintain evidence that at least one homeless or formerly homeless individual sits on the board of directors or other equivalent policymaking entity

- Affirmatively Furthering Fair Housing (CoC-funded projects only) – document compliance with the requirement that they are making appropriate efforts to reach out to eligible program participants who would be least likely to apply for program participation without such effort.

Grant-Specific Recordkeeping Requirements

SCICoC homeless projects must also maintain the following records pertaining to their specific projects:

- Project-Specific Policies and Procedures – maintain policies and procedures regarding documentation of program participant eligibility and all other aspects of program operation to ensure compliance and consistency among staff
- Services Provided – document the types of supportive services provided to participants and the amount spent on those services, as well as evidence that ongoing assessment of overall service needs was offered and/or provided.
- Housing Quality Standards – where required to be conducted, retain documentation demonstrating that HQS inspections were completed for units paid for with leasing or rental assistance funds.
- ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing – where required to be conducted, retain documentation demonstrating that habitability inspections were completed for ESG-funded projects
- Match – maintain records of the source and use of all cash and in-kind contributions used to satisfy federal/state match requirements. These records must further indicate the grant/project and fiscal year for which the matching contributions were provided.

Program Participant Recordkeeping Requirements

SCICoC homeless projects must document and maintain records related to participant eligibility and the services provided to participants. An overview of these requirements is as follows:

- Homeless Status – maintain records documenting acceptable evidence of participants' homeless status.
  - When documenting homeless status, 24 CFR 576.500 (b) requires compliance with the order of priority for obtaining evidence as follows:
    - *1. Third*-party documentation,
    - *2.* Intake worker observations,
    - *3.* Certification from the person seeking assistance
- *However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used*

> *by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.*

- This means that homeless status must be documented first with third-party written verification of homelessness (e.g. HMIS record, documentation on letterhead from shelter or TH project). If that documentation is not attainable, only then can third-party oral verification (intake worker's observation) be used as documentation, and only after case workers have documented their due diligence in attempting to obtain third-party written verification of homeless status. Self-certification of homeless status is only permitted if neither third-party written nor third party oral verification could be obtained, and due diligence was documented.

- Other Program Eligibility Verification – document compliance with any other program eligibility criteria, such as disability status

- Services and Assistance Provided – homeless projects must keep records for all program participants that outline the service provided, including:

  - Evidence that, at minimum, an annual assessment of service needs was completed (certain programs require more frequent assessment)

  - In cases of participant termination from a program, the project must demonstrate that it followed all applicable federal requirements

- Annual Income – when any kind of rent is paid by program participants or when program eligibility is based in part on income, the homeless project must keep the following documentation of annual income:

  - Income evaluation form (some programs require that specific forms be completed)

  - Source documents (wage statements, bank statements, etc)

Personnel in Homeless Programs

SCICoC homeless programs must be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

- For service staff, the agency selects only those employees and/or volunteers with appropriate knowledge and experience to work with households experiencing homelessness

- The program provides training to all staff and volunteers on both the policies and procedures employed by the program and on specific skill areas as determined by the program

- All staff and volunteers participate in ongoing and/or external training to further enhance knowledge and abilities to provide services

Homeless Program Termination Policies and Procedures

SCICoC homeless programs must have termination policies and procedures that ensure that participant termination is limited to only the most severe cases. These termination policies and procedures must include the following:

- Due Process ○ In terminating assistance to a program participant, the program must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of the law. This process must consist of:
  - Providing participants with a written copy of the program rules and termination process before participant begins receiving assistance
  - Providing written notice to the participants containing a clear statement of the reasons for termination
  - A review of the decision by another staff person (who did not make initial decision), wherein participants may present written or oral objections to the termination
  - Prompt written notice of the final decision to participants
- Programs must examine all extenuating circumstances in determining when violations are serious enough to warrant termination to help ensure that assistance is only terminated in the most extreme cases.
- Termination from a program does not bar the program from providing further assistance at a later date to the same household

Homelessness Prevention Standards

The purpose of Homelessness Prevention (HP) projects is to prevent individuals and families who are at greatest risk of homelessness from becoming literally homeless.

Homelessness Prevention Eligibility

Homelessness Prevention (HP) projects must serve persons who meet category 2 or 4 of HUD's homeless definition, as outlined in the previous section, or persons who meet HUD's definition of At-Risk of Homelessness. Providers should remember that the individuals/families defined as At-Risk of Homelessness must meet all of the following criteria:

- Meet income requirements set by federal or state funder

- Do not have sufficient resources or support networks immediately available to prevent literal homelessness
- Meet at least one of the following seven conditions:
  - Moved two or more times due to economic reasons in 60 days prior to application for assistance
  - Living in home of another due to economic hardship ○ Losing housing within 21 days after application date ○ Live in hotel/motel not paid for by charitable organizations or federal/state/local government programs
  - Live in severely overcrowded unit as defined by the US Census Bureau ○ Exiting publicly funded institution or system of care ○ Live in housing associated with instability and increased risk of homelessness, as defined in the Con Plan

Providers should remember that to be defined as homeless under category 2 of HUD's homeless definition individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing. All of these must be documented as described in the previous section.

Documentation and Record-keeping Requirements

All SCICoC HP projects must ensure they abide by all the documentation (of homeless or at-risk of homelessness status and project eligibility) and record-keeping requirements.

Housing First in Homelessness Prevention

All SCICoC homeless assistance projects must follow a Housing First approach. For HP projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Reducing barriers to entry ○ HP projects must minimize any barriers to entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility requirements and population prioritizations. At minimum, HP projects CANNOT require the following as a condition of entry in to the project:
  - Minimum income level and/or employment
- Although it is reasonable to expect that a client assisted with HP will be able to obtain employment/income at some point before HP assistance ends, receipt of income cannot be an eligibility criterion
  - Completion of drug test ○ HP projects should screen people applying for prevention assistance to identify people with greater vulnerabilities

and/or urgency, i.e., closer to becoming literally homeless, to prioritize applicants for assistance when demand exceeds resources

- HP considers those households already in doubled-up situations, rather than households residing in their own rental unit, as more at risk for literal homelessness. Doubled-up households being forced out of their current housing situation should be prioritized over those in their own rental unit.

Housing First in Program Design

- Voluntary Supportive Services ○ HP projects must offer services to program participants to meet with case managers on a regular basis for purposes of working through plans/steps related to overcoming immediate and direct housing barriers and securing/maintaining housing.

- Housing Focused Assistance ○ HP projects' primary goal is to prevent literal homelessness as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, they are tailored to the client's needs as they pertain to obtaining or maintaining permanent housing.

  - ○ HP financial assistance (ie, rental assistance) is individualized and flexible. This means, for example, that HP projects do not have a policy of providing only one month of financial assistance. All HP projects should assess program participants' need to determine their individualized amount of financial assistance and the duration of that assistance.

Emergency Shelter Projects Standards

The purpose of Emergency Shelter (ES) projects is to provide temporary shelter to households who are homeless and have no other housing options or resources to obtain housing.

Emergency Shelter Eligibility

Emergency shelter (ES) projects must serve persons who meet category 1, 2, or 4 of HUD's homeless definition, as outlined in the previous section. Providers should remember that to be defined as homeless under category 2 of HUD's homeless definition, individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing. All of these must be documented as described in the previous section.

ES projects must comply with HUD's requirements related to the definition of family as outlined earlier in this document, and they must keep families intact.

Documentation and Record-keeping Requirements

All SCICoC ES projects must ensure they abide by all the documentation (of homeless status and project eligibility) and record-keeping requirements.

Housing First in Emergency Shelters

All SCICoC homeless assistance projects must follow a Housing First approach. For ES projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Diversion ○ ES projects should divert people/households with other housing options or resources away from shelter and offer immediate linkage to homelessness prevention resource where needed, desired, and available.
- Reducing barriers to entry ○ ES projects must minimize any barriers to entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility requirements. At minimum, ES projects CANNOT require the following as a condition of entry in to the project:
    - Minimum income level
    - Completion of drug test ○ ES projects should not have policies that prohibit or limit returns to the project for more than 30 days immediately after client exit, except for cases in which a program participant poses a danger to other residents or staff. Persons experiencing homelessness should be provided with shelter when needed.
    - Where a shelter applicant cannot be served b/c of concerns about resident and/or staff safety, shelter staff are obligated to work with the applicant to identify another housing/shelter option.

Housing First in Program Design

- Voluntary Supportive Services ○ ES projects must offer supportive services to program participants on a voluntary basis. However, ES projects may require program participants to meet with case managers on a regular basis for purposes of working through plans/steps related to overcoming immediate and direct housing barriers and securing housing.
- Housing Focused Assistance
    - ○ ES projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, but they are tailored to the client's needs as they pertain to obtaining permanent housing.

Transitional Housing Projects Standards

The purpose of Transitional Housing (TH) projects is to facilitate the movement of homeless individuals and families to permanent housing as quickly as possible. TH projects should be targeted to persons who have been assessed as not being able to quickly resolve their homelessness on their own, but who do not have needs great enough to necessitate placement into Permanent Supportive Housing.

Transitional Housing Eligibility

All TH projects must serve persons who meet category 1, 2, or 4 of HUD's homeless definition.

TH projects serving category 2 homeless should remember that to be defined as homeless under category 2 of HUD's homeless definition individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing. All of these must be documented.

Documentation and Record-keeping Requirements

All Ohio SCICoC TH projects must ensure they abide by all the documentation (of homeless status and project eligibility) and record-keeping requirements.

Transitional Housing Prioritization

TH projects should be targeted to persons who have been assessed as not being able to quickly resolve their homelessness on their own, but who do not have needs great enough to necessitate placement into Permanent Supportive Housing. TH projects should further screen homeless applicants to identify people with greater vulnerabilities and prioritize those applicants for assistance.

Housing First in Transitional Housing

All SCICoC homeless assistance projects must follow a Housing First approach. For TH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Reducing barriers to entry ○ TH projects must minimize any barriers to applicant's entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility and prioritization

    requirements. At minimum, TH projects CANNOT require the following as a condition of entry in to the project:

    - Minimum income level

■ Completion of drug test ○ TH projects should prioritize for assistance those persons with greater vulnerabilities.

Housing First in Program Design

- Voluntary Supportive Services ○ TH projects must offer supportive services to program participants on a voluntary basis. However, TH projects may require program participants to meet with case managers on a regular basis for purposes of evaluating the extent to which participants have ongoing need for the TH project assistance.
- Housing Focused Assistance ○ When screening applicants for admission into the TH project, TH projects must assure that applicants are linked with TH assistance when:
    - ■ TH is desired by the applicant
    - ■ TH is most appropriate to meet health and safety needs of the applicant
    - ■ No permanent housing solutions (with or without services) are available that similarly or better meet the desires and needs of the applicant
  ○ TH projects' primary goal is to safely place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, they are tailored to the client's needs as they pertain to obtaining permanent housing.

Rapid Re-Housing Projects Standards

The purpose of Rapid Re-Housing (RRH) projects is to move homeless individuals and families out of emergency shelter (and, in some cases, out of TH) to permanent housing as quickly as possible.

Rapid Re-Housing Eligibility

All RRH projects must serve persons who meet category 1 of HUD's homeless definition. For RRH, category 1 of the homeless definition ONLY includes individuals and families who are sleeping in a place not meant for human habitation or living in an emergency shelter meant to provide temporary living arrangements. RRH projects funded through HUD's CoC Program are only permitted to serve persons/households currently in emergency shelter or unsheltered locations (e.g., sleeping in a car, in an encampment, etc.).

RRH projects are NOT permitted to serve individuals or families who are imminently at risk of losing their housing (category 2 of the homeless definition).

Documentation and Record-keeping Requirements

All SCICoC RRH projects must ensure they abide by all the documentation (of homeless status and project eligibility) and record-keeping requirements.

Rapid Re-Housing Prioritization

Where possible, RRH projects should be targeted to individuals and households who are unable to resolve their homelessness on their own but do not have service needs so great as to necessitate movement into TH or PSH. Within this targeted population, RRH providers should prioritize for assistance those people with greater vulnerabilities and less likelihood of exiting homelessness "but for" rapid re-housing assistance, RRH projects should strive to serve as many appropriate participants as possible, adjusting the duration and amount of assistance in order to meet the individualized needs. However, in parts of the CoC where no PSH or TH programs exist, households with the most significant needs and longest histories of homelessness should be prioritized for RRH assistance if there is nothing more appropriate to meet their needs.

Additionally, in cases where an eligible homeless Veteran has been identified, and that Veteran is not eligible for VA programs; RRH providers should prioritize the homeless Veteran for assistance.

Housing First in Rapid Re-Housing

All SCICoC homeless assistance projects must follow a Housing First approach. For RRH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Reducing barriers to entry ○ RRH projects must minimize any barriers to homeless persons/households entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any population prioritization) requirements. At minimum, RRH projects CANNOT require the following as a condition of entry into the project:
    - Minimum income level and/or employment
- Although it is reasonable to expect that a client assisted with RRH will be able to obtain employment/income at some point before RRH assistance ends, receipt of income cannot be an eligibility criterion
    - Completion of drug test ○ RRH projects should prioritize for assistance those persons with greater vulnerabilities. This may be determined, in part, through completion of the CoC's common assessment tool

Housing First in Program Design

- Voluntary Supportive Services ○ RRH projects must offer supportive services to program participants on a voluntary basis. However, RRH projects may require program participants to meet with case managers on a regular basis (monthly for RRH projects funded through the CoC Program) for purposes of ensuring the household is making progress on their housing plan and/or is stable in housing. Additionally, RRH projects may require program participants meet with case managers within three months of moving into housing for a reassessment to determine if participants having ongoing need for financial assistance and/or supportive services, and to determine if the household is still income eligible.
    - All SCICoC RRH supportive services are provided either in the participant's rental unit, or in a location that is easily accessible for program participants
- Housing Focused Assistance ○ RRH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, they are tailored to the client's needs as they pertain to obtaining and retaining permanent housing. ○ RRH financial assistance, i.e., rental assistance, is individualized and flexible. Please see the following section for details about SCICoC standards related to the provision of RRH financial assistance

Determining Rental Assistance Provided

All SCICoC RRH projects must adhere to the following standards to determine the amount and duration of RRH assistance that can be provided to program participants.

Amount and Duration of Rental Assistance

SCICoC RRH projects provide time-limited, individualized rental assistance to assist participants to obtain and retain permanent housing. Program rental assistance will be calculated as follows:

- The first three months of occupancy, the RRH project will pay 100% of the unit rent.
- The fourth month the participant will pay 25% of the total rent and the RRH program will pay the balance of the funds due.
- The fifth month the participant will pay 50% of the total unit rent and the RRH program will pay the balance of funds due.
- The sixth month the participant will pay 75% of the total unit rent and the RRH program will pay the balance of funds due.
- Starting with the seventh month, the participant will pay 100% of the unit rent.

Exceptions to lessen or increase assistance levels may be made based on the household's financial abilities and needs, with supervisory approval. In all cases, the project shall re-

assess participants at lease every three months to determine the need and continued eligibility for rental assistance.

NOTE: For the purpose of this standard, the total unit rent shall be the amount paid to the landlord if utilities are included. If the tenant is responsible for paying for utility cost the total unit rent shall be the unit rent minus the utility allowance.

Permanent Supportive Housing Projects Standards

Permanent Supportive Housing Eligibility

All SCICoC PSH projects must serve persons who meet category 1 of HUD's homeless definition AND are diagnosed with a disability. More detailed information can be found in the following sections regarding who should be *prioritized* for PSH.

PSH Eligibility When Fleeing DV (category 4 of the homeless definition)
SCICoC PSH projects can serve disabled individuals/households fleeing DV (category 4 of the homeless definition), but the people fleeing DV must reside in a shelter or TH immediately prior to entering the PSH project. Persons fleeing DV cannot enter PSH directly from a housed situation.

PSH projects are NOT permitted to serve individuals or families who are imminently at risk of losing their housing (category 2 of the homeless definition).

PSH Eligibility for Chronically Homeless

For PSH projects dedicated to or prioritizing chronically homeless, category 1 of the homeless definition ONLY includes individuals and families who are sleeping in a place not meant for human habitation, or living in an emergency shelter (and meet all other elements of the chronically homeless definition). Although non-chronic dedicated PSH projects are technically permitted to serve persons/households currently in TH, communities and providers should keep in mind that *requiring* persons to move in TH prior to entering PSH contradicts system and project-level Housing First practices. This is discussed in more detail in the following *Housing First I Permanent Supportive Housing* section.

The definition of chronically homeless is as follows:
    a) An individual who:
        1. Is currently homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; AND

2. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven. AND

3. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

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

c) 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 A of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

More detailed information about HUD's final rule on the definition of chronically homeless can be found at https://www.hudexchange.info/resource/4847/hearth-defining-chronicallyhomeless-final-rule/.

Documentation and Record-keeping Requirements
All SCICoC PSH projects must ensure they abide by all the documentation of homeless status, project eligibility, chronic homeless status (where applicable), and disability and record-keeping requirements.

Disability evidence protocol:
Pursuant to 24 CFR 583.301(c), acceptable evidence of disability includes:
(1) Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently.
(2) Written verification from the Social Security Administration.

(3) The receipt of a disability check (e.g. Social Security Disability Insurance check or Veteran Disability Compensation)

(4) Other documentation approved by HUD; or

(5) Intake staff recorded observation of disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in paragraph ©(1),(2),(3), or (4) of this section.

Priority Policy for Permanent Housing Placements

Preamble

Recipients of CoC Program grants should follow the following priorities while serving identified target populations. For example, a Permanent Supportive Housing (PSH) project that targets homeless persons with serious mental illnesses should follow the priorities to the extent that targeted persons meet the criteria. If there are no persons with a serious mental illness that meet the criteria of chronically homeless, the grantee should follow the priorities in Section 3 for persons with a serious mental illness.

The South Central Illinois Continuum of Care recognizes that some persons – particularly those living on the streets or in places not meant for human habitation – require significant engagement prior to accepting housing. Grantees should not let units remain vacant indefinitely while waiting for a chronically homeless person to accept an offer of PSH.

1. Priority for Dedicated PSH Units for Persons and Families Experiencing Chronically Homeless

All grantees of projects with Permanent Supportive Housing units that are dedicated for persons and families experiencing chronic homelessness[1] shall prioritize these units based on:

a) The length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter; and

b) The severity of the individual's or family's service needs.

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[1] "Chronic Homelessness" is as currently defined by the US Department of Housing and Urban Development.

2. Priority for All Other PSH Units – Prioritized for Chronically Homelessness

All grantees of projects with Permanent Supportive Housing units that are <u>not</u> dedicated for persons and families experiencing chronic homelessness <u>shall prioritize</u> every unit for persons and families experiencing chronic homelessness. Within the category of chronic homelessness, these units shall be prioritized based on:

a) The length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter; and

b) The severity of the individual's or family's service needs.

3. Priority for Non-Chronic Homelessness

When there are no chronically homeless individuals and families within the CoC's geographic area that can be housed in a vacant unit, all grantees shall follow the following order of priority for housing placements:

a) **First Priority: Homeless Individuals and Families with a Disability with Long Periods 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.

b) **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.

c) **Third Priority: Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter 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.

d) **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.

Assessing Severity of Need

SCICoC PSH projects use the CoC's common assessment tool, the VI-SPDAT to help determine the severity of service needs of homeless persons on local PSH waitlists. If information about homeless persons' use of local crisis services is available as well, this information may supplement the assessment information in order to better understand severity of need.

Housing First in Permanent Supportive Housing

All SCICoC homeless assistance projects must follow a Housing First approach. For PSH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry
- Reducing barriers to entry ○ PSH projects must minimize any barriers to homeless persons/households entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any prioritization) requirements. At minimum, PSH projects CANNOT require the following as a condition of entry into the project:
    - Minimum income level and/or employment or ability to obtain income/employment
    - Completion of drug test
    - Participation ion TH program prior to entering PSH
  - ○ PSH projects must assess people applying for the project to identify people with greater vulnerabilities to prioritize applicants for assistance, based on the order of priority outlined in the preceding section

Housing First in Program Design
- Voluntary Supportive Services ○ PSH projects must offer supportive services to program participants on a voluntary basis. However, PSH projects may require

program participants to meet with case managers on a regular basis for purposes of ensuring the household is stable in housing and has ongoing need for services.

- o PSH projects should work with program participants on a regular basis to identify a plan for assessing for reduced supportive service needs and possible movement onto a non-PSH affordable housing option when/if the program participant desires.
- o Standard Lease Agreement
  - ▪ PSH projects must ensure that there is a standard lease agreement in place between the landlord/property manager and the program participant. The lease agreement cannot include reference to participation in supportive services or compliance with a treatment plan as a condition of ongoing tenancy
- Housing Focused Assistance o PSH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, they are tailored to the client's needs as they pertain to obtaining and retaining permanent housing

Permanent Supportive Housing Centralized Waitlist

All SCICoC PSH projects must follows the CoC's Coordinated Entry Policies and Procedures related to creating and maintaining PSH Waitlist.

Implementation of and Compliance with Program Standards

All SCICoC homeless programs required to comply with these standards, as outlined in the section regarding applicability of the standards, must update all relevant organizational and program documents to reflect compliance with these standards within six (6) months of the release of the standards. Furthermore, all impacted program elements, such as recordkeeping practices, must be updated to align with these standards within 6 months of their release.

Once homeless programs are ready to implement updated documents, policies/procedures, and protocol in compliance with these SCICoC Homeless Program Standards, they should take care to ensure that implementation only impacts new clients entering the project after adoption of updated policies. Clients who entered the project prior to the updating of program documents and policies should not be impacted negatively by those programmatic changes. For example, if a PSH project updates their prioritization policies in compliance with these standards, but still has current clients who likely wouldn't be prioritized for the PSH project under the new policies, those clients should be permitted to retain their housing. New clients

applying to the PSH project after implementation of the updated prioritization policies will only be accepted into the project if they are prioritized according to the new policy. Updated policies should not be retroactively applied to current clients.

Beginning in 2017, CoC staff will begin reviewing updated program documents of federal and state funded homeless projects for compliance with these program standards as part of project evaluation and/or monitoring processes. Projects failing to comply may be required to develop a Quality Improvement Plan.