

# Suncoast Continuum of Care (FL-500)

## Written Standards





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## Introduction

The Suncoast Continuum of Care (CoC) serving Manatee and Sarasota Counties (FL-500) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the CoC. The Suncoast Partnership to End Homelessness (SPEH) is the lead agency for the CoC. 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 ESG or 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 permanent housing.

The written standards have been created in conjunction with HUD Notice CPD-14-012 issued on July 28, 2014 titled Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status that can be found online here: <http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf>

The Continuum of Care Written Standards will:

- Assist with the coordination of service delivery across the geographic area and will be the foundation of the Oneby1 Coordinated Entry System;
- Assist in assessing individuals and families consistently to determine program eligibility;
- Assist in administering programs fairly and methodically;
- Establish common performance measurements for all CoC components; and
- Provide the basis for the monitoring of all CoC and ESG funded projects.

These written standards have been developed in conjunction with ESG recipients, service providers, and CoC Leadership Council to allow for input on the procedure of Oneby1 Coordinated Entry System, standards, performance measures and the process for full implementation of the standards throughout the CoC from the perspective of those organizations that are directly providing homeless housing and services, Emergency Shelter (ES), Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH).



The CoC Written Standards have been approved by the CoC Leadership Council. The Written Standards will be reviewed and revised as needed at a minimum of once per year.

In the event of a National, State, or Local Government declaration of emergency, this document may be amended accordingly in response.

### **ESG Program Requirements**

The Program Requirements for all programs are as follows:

- Programs must coordinate with other homeless services within the CoC.
- Programs must coordinate with, refer to, and ensure client access to mainstream resources in the CoC including housing, social services, medical (physical and mental/emotional), 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 receiving ESG and CoC funding must participate in the Homeless Management Information System (HMIS), unless otherwise stated by federal regulations. All programs serving those who are experiencing homelessness or are at risk of homeless are encouraged to fully participate in HMIS, whether or not they are required by federal, state or local mandate.
- Programs must meet minimum HMIS data quality standards, as specified by the HMIS committee of the CoC Leadership Council. These standards can change from time to time and may also be different depending upon the source of funding. Organizations who enter data into HMIS must be prepared to correct data as needed to ensure the best possible data quality.
- Program participants must be provided all applicable HMIS releases as required by HMIS regulations including HMIS privacy notices and Release of Information agreements.
- Programs must participate in the Coordinated Entry System and use the prioritization criteria established in this document.
- Programs must conduct an initial evaluation to determine the anticipated amount and type of assistance needed to regain stability in permanent housing.
- 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.
- Termination does not necessarily preclude assistance at a future date.
- 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 or ESG. These activities can be conducted (but not supported with federal funds) but must be separate and voluntary for program participants.

### Coordinated Entry

The local Coordinated Entry System for CoC FL-500 is *Oneby1*. This nationally recognized best practice and federally mandated system works as part of the homeless crisis response system towards the goal of homelessness being rare, brief, and nonrecurring. The *Oneby1* Coordinated Entry System (CES) allows for people in Sarasota and Manatee County to access needed housing and other services through a uniform screening and assessment, defined prioritization and program matching guidelines, and monitored referrals to services to help those seeking housing and services access programs more efficiently. Clients who are literally homeless, or cannot be otherwise diverted, will receive a *Oneby1* Coordinated Entry Access Point Intake at one of the 9 Access Points in our community. Clients are then added to the Community By-Name List (BNL) and prioritized for referral to a housing project.

In addition to partners who are mandated to participate in the CES by their funding source, all agencies providing housing assistance throughout Sarasota and Manatee are encouraged to participate in the efforts to streamline coordinated access to housing for those who are in the greatest need.

### Housing First

CoC funded housing providers are required to adhere to a Housing First philosophy and implement this philosophy into their intake process as well as their program process if they self-identify as a housing first program in their annual CoC project application. A Housing First philosophy and intervention must be adopted by all CoC and ESG programs, which lowers barriers to housing by ensuring applicants are not screened out due to:

- Having too little or no income;
- Active or history of substance abuse;
- Having a criminal history (with exceptions for federal and/or state-mandated restrictions);
- History of domestic violence (lack of order of protection, period of separation from abuser, law enforcement involvement).
- A Housing First philosophy and intervention also ensures that residents are not terminated due to:



- Failure to participate in support services;
- Failure to make progress on a service plan;
- Loss of income or failure to improve income;
- Domestic violence;
- Any other activity not covered in a lease agreement typically found in the community. Tabbed termination reasons

All CoC funded programs must adopt the Housing First and Low Barriers approach. The CoC will authorize limited exceptions for projects in the adoption of a housing first model where it conflicts with funder requirements or local/state/federal law (e.g., restrictions on serving people who are listed on sex offender registries).

### Equal Access & Non-discrimination

Providers must have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless crisis response system. Providers must comply with all federal statutes and rules including the Fair Housing Act 1and Equal Access to Housing Final Rule 2. A determination of eligibility for housing that is assisted by HUD or subject to a mortgage insured by HUD shall be made in accordance with the eligibility requirements provided for such program by HUD, and such housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status. The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household. Projects that serve families with children must serve all types of families with children; if a project targets a specific population (e.g., women with children), these projects must serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults that reside together. The age and gender of a child under 18 must not be used as a basis for denying any family's admission to a project.

### Participant Eligibility

The Suncoast Partnership State ESG Program participates and complies with the Oneby1 Coordinated Entry System. Oneby1 utilizes standard assessment tools and protocols approved by the CoC and in alignment with best practices shared by the United States Interagency Council on Homelessness (USICH) the National Alliance to End Homelessness (NAEH) and the Supportive Services for Veteran Families (SSVF) program. Specific protocols have been established to address the health and safety concerns for those of the high and highest acuity of need and those who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim specific providers.

The initial eligibility process will take place with the approved Oneby1 Project Manager to determine whether the client meets HUD's definition of homeless or at risk of homelessness. If the client, using the information provided from the Oneby1 Coordinated Entry Access Point intake, appears eligible and of the high or highest acuity of need, and the housing provider project has indicated in writing that they have the capacity to accept new referrals, the



Oneby1 Project Manager will then send a referral to the available sub recipient. Once a client has engaged and began a housing plan with a case manager, the client will be enrolled in the project, subject to further eligibility determinations collected by the case manager, and documented in client HMIS files preferably through third-party documentation. Policies and Procedures for the Oneby1 Coordinated Entry System can be found on the Suncoast Partnership to End Homelessness website: [www.suncoastpartnership.org](http://www.suncoastpartnership.org).

### Street Outreach

Street outreach is a service for the specific purpose of reaching out to unsheltered persons experiencing homelessness; connecting them with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care. Individuals defined as unsheltered must meet the criteria for: Category 1, literally homeless; or Category 4, fleeing/attempting to flee domestic violence (where the individual or household also meet the criteria for category 1); and are:

- Living on the streets (or other places not meant for human habitation); *and*
- Unwilling or unable to access services in emergency shelter.

Sub grantees are required to target unsheltered persons experiencing homelessness and/or families whose primary nighttime residence is a public or private place not meant for human habitation.

Eligible costs for the Street Outreach component of ESG as defined in 24 CFR 576.101 include engagement; case management; emergency health services; emergency mental health services; transportation; and services for special populations (homeless youth, victim services, and people living with HIV/AIDS) and are further discussed below.

### Engagement Services

Engagement Services are activities to locate, identify, and build relationships with unsheltered persons experiencing homelessness to offer immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and other housing programs. Eligible costs include:

- Conducting an initial assessment of applicant for emergency services;
- Providing crisis counseling;
- Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;
- Actively connecting and providing information and referrals to needed services; and
- Completing a Oneby1 Coordinated Entry Access Point Intake upon date of engagement.

### Case Management

Case Management activities under Street Outreach include the following eligible costs:

- Conducting initial evaluations including, verifying and documenting eligibility;
- Completing a Oneby1 Coordinated Entry Access Point Intake;





- Counseling;
- Developing/securing/coordinating services;
- Helping obtain Federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;
- Developing an individualized housing stabilization plan that leads to the attainment of stable permanent housing and can address critical emergent needs identified during the assessment and intake process.

### Emergency Shelter

The Emergency Solutions Grants (ESG) Program interim rule establishes minimum standards for safety, sanitation, and privacy in emergency shelters funded with ESG. Eligible costs under 24 CFR 572.102 include essential services (case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and/or services for special populations – homeless youth, victim services, and people living with HIV/AIDS); renovations; and shelter operations including the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter.

Where no appropriate emergency shelter is available for a person or family experiencing homelessness, eligible costs may also include a hotel or motel voucher for that family or individual.

### Admission

As emergency shelter is a key component of an effective homeless crisis response system, ESG funded shelters are low barrier and have low demands for stay. The length of stay is generally expected to be less than 30 days however outside circumstances such as a competitive housing market and lack of permanent supportive housing to meet community demand can lead to an increased length of stay.

The level of support services available to participants can vary greatly from program to program.

### Diversion from Shelter

Shelter Diversion is a strategy that prevents individuals from entering the homeless crisis response system by helping people identify immediate alternative housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. Every effort should be made to divert clients to other housing solutions at their first contact with the homeless crisis response system.

Diversion programs can reduce the number of families becoming homeless, the demand for shelter beds, and the size of program wait lists. USICH and the National Alliance to End Homelessness (NAEH) encourage communities to include shelter diversion as an important



part of Coordinated Entry, particularly for families. Shelter Diversion can include: financial assistance to maintain current housing; conflict resolution and mediation to return to housing; or assistance to locate and secure new housing through financial assistance and advocacy.

#### Essential Services and Referrals

Shelter essential services include: case management; child care; education services; employment assistance and job training; outpatient health services; legal services; life skills training; mental health services; substance abuse treatment services; transportation; and services for special populations. Provision of services should be determined based on client need and in alignment with sub grantee's targeted populations.

Provision of essential services and shelter must be available to shelter residents for at least the time period during which the ESG funds are provided. Services do not need to be limited to a particular site as long as the site serves the same categories and types of homeless originally provided with essential services or serves persons experiencing homelessness in the same service area where the sub grantee originally provided the services.

#### Length of Stay and Discharge

Emergency Shelter and Bridge Housing operate as a low-barrier shelter that provide a safe, secure, and clean place to stay for those who cannot be diverted from the homeless crisis response system. These programs are intended to be a short-term bridge to placement in permanent or more long-term housing options and provide support with accessing housing resources in the community as quickly as possible. The services also provide the opportunity to engage and develop relationships with persons experiencing homelessness who have had difficulty transitioning from the "street" to the homeless continuum of care. Each operates from the same framework and share the goal of providing a temporary shelter while moving toward permanent housing, and programs are intended to provide short-term assistance, typically for up to 90 days, or until a client is housed. Shelters will discharge individuals and families when they have reached the end of stay (as dictated by program policy). To the maximum extent possible, shelters will work to prevent release of households into homelessness. Limitations on individual and family shelter stays must be identified in writing in the sub grantees' policies and procedures governing shelter operations and provided to all shelter residents at intake.

#### Safety and Accommodations of Special Populations

Any shelter facility that receives ESG assistance operations is required to meet all federal, state and local government safety, sanitation and accessibility standards including compliance with the safety, sanitation and privacy requirements contained in 24 CFR 576.403. Sub grantees are required to develop and implement written procedures and communication tools/materials that ensure persons of any particular race, color, ethnicity, religion, sex, age, national origin, familial status, or disability who may qualify for shelter and essential services are aware of and have access to such facilities and assistance. Reasonable accommodations for persons with disabilities must be available in order to ensure disabled participants have an equal opportunity to utilize the shelter and receive essential services. Greater levels of



accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.

Domestic violence victims and other persons in need of victim services must have access to a safe setting and have their identity protected. Sub grantees are required to implement procedures to ensure confidentiality of records pertaining to any individual who is provided family violence prevention, treatment or other services. Sub grantees must also certify that the address of a family/individual violence shelter will not be made public without permission of the shelter agency and the family/individuals served.

Sub grantee emergency shelter policies and procedures must:

- Prohibit disclosing personally identifying victim information to any third party without consent of the victim;
- Ensure victim consent is reasonably time-limited, written and specific as to whom information will be shared;
- Identify and utilize an alternative HMIS to collect program data that will prevent the disclosure of personally identifying victim information; and
- Include confidentiality policies and procedures that require staff to refrain from discussing client information in public and ensure client records are secure and only accessible to authorized staff.

#### Integration/Coordination with Mainstream Services

Sub grantees are required to be active members of the CoC and contribute to the identification, development and coordination of resources that will promote and increase the efficiency and effectiveness of the community's homeless crisis response system. Sub grantees must coordinate and integrate, to the extent possible, their ESG-funded assistance with other programs serving homeless and at-risk of homelessness people within the service area, including referral process (refer to 24 CFR 576.400).

#### Homeless Prevention

Homeless Prevention Services are intended to prevent persons who are housed from becoming homeless by helping them regain stability in their current housing or other permanent housing.

#### Eligibility

Eligible participants must have annual incomes at or below 30% of area median income, and be:

- at imminent risk of homelessness,
- homeless under other federal statutes,
- fleeing/attempting to flee domestic violence,
- or meet the criteria for being at-risk of homelessness.

Eligible participants include Households who:

1. Do 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
2. Meet 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;
- b. Is doubled up, and not listed on the lease because of economic hardship;
- 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;
- 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;
- 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;
- f. Is exiting a publicly funded institution or system of care;
- g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the Consolidated Plan(s) or CoC approved Strategic Plan;
- h. A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute, such as Section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with him or her.

Eligible costs established under 24 CFR 576.103 include providing housing relocation and stabilization services (rental application fees, security deposits, last month's rent, utility payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair); and short-term and/or medium-term rental assistance.

#### Standards for Assistance Provided, Duration, and Reassessment

Homeless prevention reassessments are required every three months for those who receive ongoing financial assistance and must verify that a household continues to have an annual income at or below 30% of area median income and lacks the resources or support to retain or obtain appropriate permanent housing. Additionally, the following standards are set forth:

- Participants receiving more than one month of rental assistance are required to meet with their housing stabilization specialist/social worker at least once per month.
- Participants are required to contribute 30% of their monthly adjusted income or 10% of their monthly income (higher of the two amounts) towards rent, and participant household incomes are recertified every 3 months: monthly household income at or below 30% AMI. Participants must make payments directly to the housing owner (or their agent, such as a property manager).
- Participants must have a written lease in order to receive rental assistance as indicated below.



- Rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent established by HUD, and complies with HUD’s standard of rent reasonableness.
- When providing rental assistance under the homeless prevention component of the ESG program, assistance may only be provided in cases where a rental assistance agreement is in place between the provider and owner that sets forth the terms under which the rental assistance is being provided. It must *at least* include the following:
  - A provision requiring the owner to give the provider a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant, as indicated in §576.106(e)).
  - The same payment due date, grace period, and late payment penalty requirements as the program participant’s lease, as indicated in §576.106(f)).
  - For project-based rental assistance, the initial term of the rental assistance agreement must be 1 year. For tenant-based rental assistance, recipients/sub recipients should establish the term of the rental assistance agreement for the period of time they anticipate providing assistance.
  - All protections for victims of domestic violence, dating violence, sexual assault, or stalking that apply to tenants and applicants under 24 CFR part 5, subpart L, as supplemented by § 576.409.

When closing a case:

- Case managers must provide information to participants about how they can access assistance from the program again if needed and what kind of follow-up assistance may be available;
- Case managers must complete a discharge plan with the client and assess the client’s ongoing stability;
- Case managers must complete a post-exit follow-up in HMIS with clients at 30, 90, 180, and 365 days *after* client has exited the Homeless Prevention project to monitor client stability and housing retention.

### **Rapid Rehousing**

Rapid Rehousing (RRH) services are intended to help eligible participants who are literally homeless, including fleeing/attempting to flee domestic violence, to transition from the streets or shelter as quickly as possible into permanent housing and achieve housing stability. Rapid Rehousing is an intervention designed to help individuals and families exit homelessness quickly by returning to permanent housing without preconditions (including, but not limited to, sobriety, employment, absence of a criminal record, or income). Additionally, the resources and services provided are tailored to the unique needs of the household receiving assistance.



### Eligibility Criteria

- Eligible participants for service component must lack the resources or support networks to help them retain or obtain other appropriate, stable housing.
- Households must meet the HUD definition of homelessness Category 1 and Category 4.
- Programs may not establish additional eligibility requirements beyond those specified here for ESG and those required by local, state, and federal funders for non-ESG;
- For ESG funded programs, program participant household's annual income should be at or below 30% Area Median Income (AMI) at annual re-evaluation.
- Clients not eligible for RRH assistance will be referred to projects suitable to the client's need and eligibility.

### Prioritization

Eligible participants are referred to the Rapid Rehousing program based on the Oneby1 Community By-Name List (BNL). Client's priority is based on the following data points:

- Vi-SPDAT Score,
- Length of time homeless,
- Length of time on the Community BNL, and
- Sub-population (i.e. Disabled, Domestic Violence, Youth, etc).

Per federal regulations, only those referrals made through Oneby1 Coordinated Entry to the sub grantee will be entered into the Rapid Rehousing program.

### Determining Percentage of Rent Households Must Pay

The goal of RRH is to have the household contributing 100% of the rent at the time of termination of rental assistance. Programs providing RRH assistance will use a progressive engagement model, with best practices including the following:

- Voluntary and flexible participation by program participant;
- Critical thinking and problem solving conversations between program participant and case manager;
- Assistance based on program participant's identified need;
- Connections to community resources;
- Builds on program participant's resiliency and strengths;
- Focused goal: to quickly resolve the immediate crisis of homelessness.

At initial program entry, 100% of the cost of rent in rental assistance may be provided to program participant. However, to maximize the number of households that can be served with RRH services, it is expected that the level of subsidy will be based on the goal of providing only



what is necessary for each household to be stably housed for the long term. Participants will have income evaluated every 3 months to determine if further assistance is needed.

RRH case managers should work with participants receiving assistance to develop a plan whereby rental subsidies will decrease as the participant prepares to become self-sufficient from the rental assistance. Rental assistance can only be provided for a unit that meets funding source criteria.

### Program Standards

The Suncoast Partnership and sub grantees adopt the RRH program standards outlined in the RRH Performance Benchmarks and Program Standards published in February 2016 by the National Alliance to End Homelessness (NAEH) and follow guidelines shared by USICH and other Federal RRH program models such as SSVF. They include the core program components listed above and provide detailed standards for programs to operate by.

### Program Components

There are three core components that constitute a Rapid Rehousing program, all of which must be available in order to qualify as a Rapid Rehousing program. Rapid Rehousing core components include the following: Housing Identification, Rent/Move-In Assistance (Financial) and Rapid Rehousing Case Management and Services. The details of these components are as follows:

#### ***Housing Identification***

- Within the limits of the participant's income, a RRH program helps households access units that client's find desirable, are sustainable, provide safety and are adequate to meet the client's needs such as access to transportation, and close proximity to employment and other support networks.
- Assistance includes accompanying the participant to potential housing locations as determined by case plan.
- Housing identification efforts are designed and implemented to actively recruit and retain landlords and housing managers willing to rent to program participants who may otherwise fail to pass typical tenant screening criteria.
- Critical to the formation of landlord-program relationship is the recognition of the landlord as a vital partner. The RRH provider must be responsive to landlords to preserve and develop those partnerships for future housing placement.

#### ***Rent and Move-In Assistance***

- Rent and move-in assistance should be flexible and tailored to the varying and changing needs of a household while providing the assistance necessary for households to move immediately out of homelessness and to stabilize in permanent housing.
- A RRH program should make efforts to maximize the number of households it can serve by providing households with the financial assistance in a progressive



manner, providing only the assistance necessary to stabilize in permanent housing.

- The level of rental assistance and participant contribution to rent is described in an individualized case plan but do not exceed the limits established in the ESG Policies and Guidelines adopted by the CoC.
- Assistance may include rental subsidy and deposits, move-in assistance, or housing supports as allowed by the assistance-funding source.
- The term of rental assistance for RRH is based on the client's need in order to regain stability in permanent housing. This can be as little as one month or be renewed for a maximum of 18 months. It is expected that most participants will need 12 months or less of subsidy.
- The level of participant contribution to rent should increase during the program term so that the participants are paying 100% of rent by time of termination.

### ***Case Management and Services***

- RRH case management should be participant-driven. Case managers should actively engage participants in voluntary case management and service participation by creating an environment in which the participant is driving the goal-setting based on what they want from the program and services, rather than on what the case manager decides they need to do to be successful.
- RRH case management should be flexible in intensity—offering only essential assistance until or unless the participant demonstrates the need for or requests additional help. The intensity and duration of case management is based on the needs of individual households and may lessen or increase over time.
- RRH Case management services will be offered based off client's need, with a minimum of one case management service a month to determine client's financial assistance need.
- RRH Case management services should be available in the participant residence, a readily accessible office setting, or any other agreed upon location that meets the client's needs.
- RRH case management uses a strengths-based approach to empower clients. Case managers identify the inherent strengths of a person or family instead of diagnoses or deficits, and then build on those strengths to empower the household to succeed.
- RRH program case management reflects the short-term nature of the rapid rehousing assistance. It focuses on housing retention and helping a household build a support network outside of the program. It connects the participant with community resources and service options, such as legal services, health care,





vocational assistance, transportation, child care, and other forms of assistance, that continue beyond.

- RRH program case managers will connect program participants with any potential mainstream benefits (i.e. SSI/SSDI, SNAP, WIC, etc.) to increase client stability and meet client needs.
- RRH program case management does not end when rental assistance has been discontinued, if there is a need and desire on the part of the client to continue to engage, or other aspects of the Case Management plan for the client have not yet been realized.

When closing a case:

- Case managers must provide information to participants about how they can access assistance from the program again if needed and what kind of follow-up assistance may be available;
- Case managers must complete a discharge plan with the client and assess the client's ongoing stability;
- Case managers must complete a post-exit follow-up in HMIS with clients at 30, 90, 180, and 365 days *after* client has exited RRH project to monitor client stability and housing retention.

#### Rapid Rehousing Performance Standards

The Suncoast Partnership and the CoC Leadership Council have set the following system wide performance standards:

1. 85% of those who have entered the RRH project.
2. 30% increase from time of entry into the project to time of exit.
3. 85% of those with a permanent housing outcome remain housed one- year later.
4. 45-60 days # of Days from entry into project to housing placement.

Failure to meet the goals doesn't result in a termination of contracted funds, but may be used to determine which Providers receive funding in future years.

#### Homeless Management Information System (HMIS)

##### Reporting Requirements

ESG funded client and activity data must be entered into HMIS (or comparable database for victim service providers). Data entry and reporting expectations include:

- Timely and consistent data entry into the HMIS ;
- Completion of all Universal Data Elements (UDEs) and all other fields in HMIS assessment as required by the CoC standards;
- Acquiring and documenting informed written consent from program participants;



- Protecting program participants' confidentiality;
- Using the HMIS as a tool to analyze data to inform and improve the delivery of services;
- Client level data is protected as per federal and HIPPA regulations, as outlined in the HMIS User Agreement, HMIS Agency Agreement, and Release of Information (ROI).

The above elements are necessary to complete the federally mandated ESG Caper and other CoC required reporting.

#### Victim Services Data Collection

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases of their own design which provide aggregate information and data consistent with HMIS data collection requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

#### Ineligible Activities and Assistance

Ineligible activities that cannot be funded with ESG include, but are not exclusive to:

- replacement of existing mainstream resources;
- payments made directly to program participants;
- payments on a mortgage or land contract;
- payment of rent for eligible individuals or families for the same period of time and for the same cost types being assisted through any other federal, state, or local housing subsidy program;
- payments on credit card bills or other consumer debt, including child support or garnishments;
- provision of cash assistance;
- payment of costs of discharge planning programs in mainstream institutions such as hospitals, nursing homes, jails, or prisons; and
- payment for religious activities (Note: While organizations that are religious or faith based are eligible to receive ESG funds, religious activities must be conducted separately, in time and location, from ESG-funded activities and participation must be voluntary for program participants).

#### Termination, Grievance and Conflict of Interest Policies

##### Termination or Denial of Assistance

Sub grantee(s) must have written denial, termination, and grievance policies and procedures. The policies and procedures should be readily available to program participants either in writing or by posting them in a public place. Copies and explanation of the policies and procedures must be provided directly to any client when denial, termination or other action affects the



client's ability to receive assistance. The notice must provide the specific reason(s) for the action and provide a process the applicant can follow to request a review of the decision.

If sub grantee is terminating rental assistance to the program participant, they must provide at least 30 days' notice to the program participant and immediately notify the landlord of the date rental assistance for their tenant will end. Termination from assistance does not prevent sub grantee from providing further assistance, later, to the same household or individual if they are determined eligible for such assistance.

### Grievance and Appeals Process

Sub grantee is required to have an established process for addressing client grievances for decisions, including termination or reduction of benefit, denial of benefit or other grievance. At a minimum, the process must include the following components:

- Informs the participant/applicant of the policy and documents participant/applicant acknowledgement of grievance procedure in client file;
- Informs the participant/applicant that they may contest any decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits;
- Allows any aggrieved person a minimum of thirty days within which to request an administrative review;
- Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- Informs the applicant/participant and SPEH in writing of the final determination and basis for the decision within ten days of the determination.

Any person or persons designated by sub grantee can complete the administrative review, other than the person who made or approved the decision under review or a subordinate of this person. SPEH retains the right to require modification of any review or appeals process that in its determination does not meet basic principles for notification, instruction, time allowance, impartiality and access. Sub grantees must make accommodations for clients who have language or disability barriers that would prevent them from participating in the appeals process.

### Conflict of Interest

#### Organizational

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or household's acceptance or occupancy of emergency shelter or housing owned by sub grantee or an affiliated organization. A sub grantee is prohibited from conducting a participant's intake assessment to determine program eligibility if the participant resides in housing where the sub grantee has ownership interest. Sub grantee would need to find another independent organization that is also an ESG grantee to do the intake assessment and ensure that all program participants are eligible even if the sub grantee has a waiver of the conflict of



interest requirements. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by HUD. If a sub grantee wishes to apply for a waiver, they should contact the SPEH Chief Executive Officer for guidance in submission of a waiver request which must be approved by SPEH who will then submit to HUD. See 24 CFR 576.404(a).

Sub grantee must keep records to show compliance with ESG programs organizational conflicts-of-interest requirements.

### Individual

For the procurement of goods and services, sub grantee must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations).

Persons for whom the Conflict of Interest requirements apply include any person who is an employee, agent, consultant, officer, or elected or appointed official of the sub grantee agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision making process or gain inside information with regard to activities assisted under the Program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

Sub grantees wishing an exception must submit written requests to SPEH for review and forwarding to appropriate contractor. There is no guarantee that an exception will be approved.

### Recordkeeping Requirements for All CoC Projects

#### Participant Recordkeeping Requirements

Sub grantees must follow the established intake procedures that include requirement of written documentation verifying eligibility for program services. Sufficient records must be established and maintained to enable the CoC and HUD to determine whether ESG requirements are being met. Suncoast Partnership will monitor any sub recipients assisting the CoC sub grantee with the ESG program to ensure the sub grantee maintains appropriate and complete records. Documentation of client eligibility and services received must be maintained in printed or electronically-saved client case files, including files for applicants found to be ineligible. File documentation will be the basis of Suncoast Partnership monitoring to ensure sub grantee is in compliance with program requirements and HUD regulations.

Participant Recordkeeping Requirements include:

- All records containing personally identifying information must be kept secure and confidential;



- Programs must have written confidentiality/privacy notice a copy of which should be made available to participants if requested;
- Documentation of homelessness must be kept (following HUD's guidelines) if CoC funded; Non- CoC funded providers must document homeless/at-risk status per funder requirements.
- A record of services and assistance provided to each participant;
- Documentation of any applicable requirements for providing services/assistance;
- Documentation of use of Oneby1 Coordinated Entry System;
- Documentation of use of HMIS;
- Records must be retained for a minimum of 5 years as prescribed by HUD.
- Financial Recordkeeping Requirements for CoC Funded Projects 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;
  - Records of all procurement actions as applicable.
  - Documentation of amount, source and use of resources for each match contribution;
  - Documentation of audits, financial statements, bank statements, general ledgers, and financial policies/procedures.

Sub grantees shall retain all program records pertinent to client services and expenditures paid with ESG funds in a manner consistent with the requirements of state and federal law.

Currently, program records including client files must be retained for a minimum of five (5) years. Program records for major rehabilitation or conversion of emergency shelter buildings must be retained for at least ten (10) years from the date that ESG funds were first obligated. Fiscal records, which include books, documents, papers, plans, and agency records that document all program expenditures, must be retained for a minimum of six (6) years, or such longer period as may be required due to any audit, controversy or litigation arising out of, or relating to, program use.



## Definitions

### HUD Chronic Homeless Definition

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:

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:

- lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless and living as described in paragraph (a)(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 paragraph (a)(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;
- 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 the criteria in paragraph (a) of this definition, before entering the facility;
- 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 the criteria in paragraph (a) or (b) of this definition (as described in Section
- I.D.2. (a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

The HUD Chronic Homelessness Final Rule can be found online:

<https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

### HUD Homeless Definition

Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or a place not meant for human habitation immediately before entering that institution; (Category 1)

Individuals and families who will imminently lose their primary nighttime residence; (Category 2)

Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition;



(Category 3)

Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member. (Category 4)

The HUD Homeless Definition with recordkeeping requirements can be found here:

[https://www.hudexchange.info/resources/documents/HomelessDefEligibility%20\\_SHP\\_SPC\\_ESG.pdf](https://www.hudexchange.info/resources/documents/HomelessDefEligibility%20_SHP_SPC_ESG.pdf)

HUD Definition of At-Risk of Homelessness:

Category 1 -Individuals and families who:

Have an annual income below 30% of median family income for the area; AND

Do 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

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 recipient’s approved Consolidated Plan.

Category 2 – A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under other Federal statutes such as under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or



Category 3 – An unaccompanied youth who does not qualify as “homeless” under the homeless definition, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.