

Keys to Home Continuum of Care FL-508

Continuum of Care and Emergency Solutions Grants Written Standards

July 2025

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Version	Date of Approval	Changes Made
1.1	August 7, 2025	Full revision
1.2	September 2025	Review and revision for compliance with executive orders

A. BACKGROUND AND PURPOSE

The Continuum of Care (CoC) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of Alachua, Bradford, Dixie, Gilchrist, Levy, Putnam, and Union counties of Florida. The CoC and ESG Interim Rules identify specific requirements for Written Standards for Projects that utilize these funds. As required under 24 CFR 578.7(a)(9) and 24 CFR 576.400(e), the Keys to Home Continuum of Care (KTH CoC) has developed the following Written Standards for assisting with federal, state, and local programs funded by the KTH CoC.

The Continuum of Care (CoC) is committed to full compliance with all applicable federal and state laws, regulations, and executive orders. This includes adherence to all guidance and positions issued under the Federal Administration, as well as any subsequent directives from authorized federal and state authorities. All CoC policies, programs, and procedures shall be implemented in alignment with these requirements to ensure lawful, ethical, and effective operations.

The purpose of the Continuum of Care is to promote a community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

The following written standards for providing assistance in the Keys to Home Continuum of Care (KTH CoC) were developed in conjunction with CoC and Emergency Solutions Grant (ESG) recipients in order to:

- Unite vision and strategy for preventing and ending homelessness within the KTH CoC geographic area
- Establish community-wide expectations for the operations of projects within the CoC,
- Ensure that the system is transparent to service users and providers,
- Create consistency and coordination among projects,
- Further the CoC's ability to meet system-wide goals,
- Implement effective, evidence-based guidelines for homeless assistance programming, and
- Ensure project compliance with federal and state regulations.

This document provides the following:

- General Standards for All Projects
- Recordkeeping Standards for All Projects
- Case Management Standards for All Projects
- Standards for Specific Project Types

The written standards were developed based on the recommendations and feedback of the CoC's Leadership Council, Coordinated Entry (CE) Committee, and general CoC membership. Best practices as shared by the National Association to End Homelessness (NAEH), US Department of Housing and Urban Development (HUD), and US Interagency Council on Homelessness (USICH) were also referenced. The Written Standards will be reviewed and revised as needed at a minimum of once per year.

The CoC recognizes that not all housing programming will be aligned with the written standards from day one, which poses several opportunities:

- Project budgets and staffing can be right sized over time to better align with written standards, and/or
- Grants can be re-written in future funding cycles to better align with written standards

Projects are expected to adhere to all additional Project requirements within the HUD regulations (24 CFR Part 578 for CoC funded and 24 CFR Part 576 for ESG funded) or any applicable state and federal regulations, as well as new requirements mandated by HUD, the Department of Children and Families (DCF), and the Keys to Home Continuum of Care.

All HUD-funded providers must follow all applicable federal regulations in their entirety. In addition, all HUD-funded projects are also expected to adhere to the standards found in this document, except where disallowed by specific federal, state, or city regulations affecting a project's coverage area.

Applicable State and Federal Regulations

Federal Authority

[24 CFR Part 576](#)

[Notice: CPD-21-08](#)

[24 CFR Part 578](#)

[45 CFR Part 260](#)

Emergency Solutions Grant (ESG) Program

Waivers and Alternative Requirements for the Emergency Solutions Grants (ESG) Program Under the CARES Act

Continuum of Care (CoC) Program

Temporary Assistance for Needy Families (TANF) Program

Florida Statutes

[Section 420.622](#)

[Section 420.622](#)

[Section 414.161](#)

Emergency Solutions Grant (ESG) Program

Challenge Grant Program

TANF Homelessness Prevention Program

Who must follow the Written Standards?

The intent of this document is to standardize the quality and type of services individuals and families can expect to receive from homeless service projects across the KTH CoC geographic area. Regardless of whether a family is experiencing homelessness in Alachua, Bradford, Dixie, Gilchrist, Levy, Putnam, or Union county, the goal of KTH CoC is to ensure that the individual or family can expect to receive the same standard of services from providers in their area.

With this goal in mind, all KTH CoC-funded projects must comply with these Written Standards to the extent that their grant agreement allows. It is highly recommended that projects that do not receive federal funding from any source follow the Written Standards to further the CoC's goals of a united vision to prevent and end homelessness through transparency, accountability, and service standardization. Additionally, should a project receiving no federal funding wish to apply for it in the future, use of the KTH CoC Written Standards will ensure that the project is following best practices, and in alignment with the practices of the CoC, thus increasing its likelihood to receive federal funds.

The Written Standards contain guidance project types; however, project types are still limited in the services and financial assistance they provide by their grant agreements, contracts, sub-contracts, funding capacity, and federal, state, or local regulations.

All program staff for subgrantees funded by the KTH CoC must review and become familiar with the Written Standards and must commit to implementing the Written Standards. All new program staff for subgrantees funded by the KTH CoC must review the Written Standards document and training materials (to be published on CoC website) within 60 days of hire. All program staff for subgrantees funded by the KTH CoC must participate in new Written Standards training whenever new training materials are available.

Key Acronyms

- BNL – By Name List
- CE/CES – Coordinated Entry/Coordinated Entry System
- CoC – Continuum of Care
- DCF – Florida Department of Children and Families
- DV – Domestic Violence
- ES - Emergency Shelter
- ESG – Emergency Solutions Grant
- HIC – Housing Inventory Count
- HMIS – Homeless Management Information System (HMIS)
- HP – Homeless Prevention
- HPS – Housing Problem-Solving
- HUD – U.S. Department of Housing and Urban Development
- KTH CoC – Keys to Home Continuum of Care
- NOFO – Notice of Funding Opportunity
- FL-508 – HUD code for the Keys to Home CoC
- PIT – Point in Time Count
- PSH – Permanent Supportive Housing
- PWLE – People with Lived Experience/Expertise
- RRH – Rapid Rehousing
- SO - Street Outreach
- SPM – System Performance Measures
- SSO -Supportive Services Only
- SSO-CE – Supportive Services Only Coordinated Entry
- TANF – Temporary Assistance for Needy Families
- TH – Transitional Housing
- TH-RRH – Transitional Housing Rapid Rehousing Joint Component
- VSP – Victim Service Provider

B. ESSENTIAL ELEMENTS

All subgrantees must adhere to the following Essential Elements:

- Participate in HMIS and comply with the HMIS Policies and Procedures. Projects serving survivors of domestic violence who cannot use HMIS must enter data into a comparable database that complies with HUD’s standards.
- Participate in the local implementation of Coordinated Entry (CE) and comply with the Coordinated Entry Policies and Procedures.
- Utilize a housing-focused approach, meaning, the ultimate goal of services and assistance is to help a household become self-sufficient in attaining permanent affordable housing of their own.
- Abide by and adopt federal, HUD, and CoC Policies including, but not limited to: the Americans with Disabilities Act (ADA), the Fair Housing Act, and the McKinney-Vento regulations pertaining to the Education of Homeless Children and Youth.
- Follow HUD’s preferred Order of Documentation when evaluating and documenting participant eligibility (See Appendix B)
- Consistently attend CoC General Membership Meetings
- Abide by and consistently apply these Written Standards

GENERAL STANDARDS FOR ALL PROJECTS

Projects must have written policies and procedures regarding Project operations and must consistently apply them to all participants. The following standards are applicable to all ESG, TANF, Challenge, and CoC-funded projects in the CoC, unless otherwise stated (additional details specific to project types are in those project type sections, if applicable):

APPLICATIONS CoC projects should submit an application for project funding to the CoC, in compliance with the CoC's timeline, for submission to HUD. ESG, TANF, and Challenge projects are non-renewable (unless otherwise stated) and should submit applications for project funding according to KTH CoC timeline and application process.

CONFLICT OF INTEREST Subgrantees must establish a conflict-of-interest policy which outlines the process for disclosing in writing any potential conflict of interest. Any perceived or actual conflict of interest must be reported to Agency in a timely manner.

No person, whether acting individually or in an official capacity, shall receive, be promised, or otherwise be incentivized by any form of kickback, bribe, or other improper payment or benefit as a result of the funds awarded through this contract. All parties involved in the execution, administration, and oversight of this contract are prohibited from engaging in any conduct that constitutes or appears to constitute a conflict of interest, including but not limited to the solicitation, acceptance, or offering of gifts, favors, or anything of value in exchange for preferential treatment or influence.

CoC-funded projects must follow 24 CFR 578.95 related to conflicts of interest. ESG projects are expected to follow the conflict of interest standards outlined in 24 CFR 576.404 related to the provision of ESG assistance, and procurement of goods and services.

COORDINATED ENTRY To minimize barriers to housing access and ensure timely placement, all subgrantees are required to participate in and receive referrals only through the KTH CoC's Coordinated Entry System (CES). Victim Service Providers are required to participate and receive referrals only through the designated KTH CES Coordinated Entry for that subpopulation.

KTH CoC is a hybrid of a decentralized access points utilizing street outreach, established to serve all 7 counties in the CoC coverage area. Initial screening can be conducted for all populations either at one of the designated access points or through Street Outreach providers.

Coordinated Entry includes the following core components:

- **Access:** The engagement point for persons experiencing a housing crisis. Access points provide information so people know where or how to access services.
- **Assessment:** A screening process utilizing a standard assessment tool to gather information about a person's needs and vulnerabilities.
- **Prioritization:** The process the CoC utilizes to ensure persons with the greatest housing need and vulnerability receive the supports they need to resolve their housing crisis.
- **Referral:** Persons are referred to available CoC housing resources and services in accordance with the CoC's documented prioritization guidelines.

This system ensures that every person experiencing homelessness is known by name, assessed, and prioritized for services consistently, and ensures referrals for interventions are appropriate given the individual's needs. Please refer to the KTH CoC Coordinated Entry System (CES) Policies & Procedures for more detailed information.

All CoC-funded TH, RRH, TH-RRH, and PSH Projects; Challenge and ESG-funded RRH and Homelessness Prevention Projects (and any other project mandated by their funder) are required to participate in CE (also known as CES – Coordinated Entry System) in the following ways:

- Serve exclusively participants who are referred to them via the Coordinated Entry case conferencing process; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES; and
- Bring all housing openings to case conferencing; and
- Follow the CoC's Order of Priority
- Provide the Access, Diversion, and Assessment phases of CES; and
- To the extent the project is funded to do so: provide the Prevention and Rapid Exit phases of CES

Street Outreach projects are expected to participate in CE in the following ways:

- Provide the Access, Diversion, and Assessment phases of CES; and
- To the extent the project is funded to do so: provide the Prevention and Rapid Exit phases of CES; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES; and
- Participate in their Region's Street outreach network, if applicable

Emergency Shelter projects are expected to participate in CE in the following ways:

- Provide the Access, Diversion, and Assessment phases of CES; and
- To the extent the project is funded to do so: provide the Prevention and Rapid Exit phases of CES; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES

Non-CoC, non-ESG, and non-Challenge funded temporary and permanent housing projects are encouraged to fill vacancies through CES and participate in case conferencing.

COCPARTICIPATION All subgrantees are required to participate in CoC-wide meetings and required CoC trainings. CoC will notify grantees of trainings via CoC mailing list and will indicate which trainings are required vs. optional. Subgrantees should also participate in CoC subcommittees and/or ad hoc workgroups as appropriate. CoC Recipients are expected to communicate all CoC training and meeting opportunities with their subrecipients and encourage subrecipient participation.

DIVERSION All Access Points, Street Outreach, and Emergency Shelter projects will attempt to return the participant to safe housing using Diversion techniques as part of the housing problem-solving (HPS) approach to services. This can include strengths-based problem-solving conversations, identifying community supports, and offering lighter touch solutions. For participants who are unable to return to safe housing via Diversion, Coordinated Entry access point staff will attempt to return the participant to safe housing using Rapid Exit techniques as part of HPS.

Persons/Projects referring participants to ES or CE should be encouraged to explore alternatives to shelter prior to making a referral, whenever possible. This will require coordination with those operating other prevention Projects.

EDUCATION FOR CHILDREN AND YOUTH EXPERIENCING HOMELESSNESS All CoC projects are encouraged to designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate

services in the community, including early childhood education programs such as Head Start, part C of the Individuals with Disabilities Education Act, and Education for Children and Youth Experiencing Homelessness programs authorized under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.). The educational needs of children should be taken into account when families are placed, and to the maximum extent practicable, families with children should be placed as close as possible to their school of origin so as not to disrupt the children's education.

ENVIRONMENTAL REVIEW All CoC-funded projects (unless exempt) are required to complete an environmental review per 24 CFR 578.31. However, per 24 CFR 576.407(d), ESG activities will require some level of environmental review & clearance. No funds may be expended until an environmental review that meets the standards outlined in 24 CFR 58 has been submitted and approved by Taskforce Fore Ending Homelessness. [For additional details, see 24 CFR 5.109(e)(g) for CoC-funded and 24 CFR 576.406 for ESG funded].

FAITH-BASED ACTIVITY Faith-based organizations are eligible, on the same basis as any other organization, to participate in HUD programs and activities, including CoC and ESG funding opportunities.

- A faith-based organization that applies for, or participates in, a HUD program or activity supported with Federal financial assistance retains its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct Federal financial assistance that it receives (e.g., via contract, grant, sub-grant, sub-award or cooperative agreement) to support or engage in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), or in any other manner prohibited by law.
- A faith-based organization that receives direct Federal financial assistance may use space (including a sanctuary, chapel, prayer hall, or other space) in its facilities (including a temple, synagogue, church, mosque, or other place of worship) to carry out activities under a HUD program without removing religious art, icons, scriptures, or other religious symbols.
- If an organization engages in explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), the explicitly religious activities must be offered separately, in time or location, from the programs or activities supported by direct Federal financial assistance and participation must be voluntary for the beneficiaries of the programs or activities that receive direct Federal financial assistance.
- Any organization that receives Federal financial assistance under a HUD program or activity shall not, in providing services or carrying out activities with such assistance, discriminate against a beneficiary or prospective beneficiary on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

HOUSEHOLDS WITH CHILDREN For projects that serve households with children:

- Projects must take the educational needs of children into account when families are placed in housing and to the maximum extent practicable, and place families with children as close as possible to their school of origin so as not to disrupt such children's education.
- A staff person may be designated as the educational liaison that will ensure that children are enrolled in school, connected to appropriate services in the community, including early childhood Projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services.
- Projects are prohibited from denying assistance to or separating members of a family with children based on gender or age.

- Prohibition against involuntary family separation. The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part.

ACCESS STANDARDS

Standard 1: Projects are low barrier, however, admission to projects may be contingent on pre-requisites such as abstinence of substances, medication adherence, criminal justice history, completion of treatment, participation in services, "housing readiness," unless otherwise required by law or funding source.

Standard 2: Projects do not deny assistance for unnecessary reasons. Procedures and oversight demonstrate that staff does everything possible to avoid denying assistance or rejecting an individual or family.

Standard 3: Projects are expedited with speed and efficiency. Projects have expedited admission processes, to the greatest extent possible, including helping participants obtain the documentation required by funding sources, as well as processes to admit participants.

Standard 4: Projects have an intake process that is person-centered and flexible. Intake and assessment procedures are focused on the individual's or family's strengths, needs, and preferences. Assessments are focused on identifying household strengths, resources, as well as identifying barriers to housing that can inform the basis of a housing plan as soon as a person is enrolled in the project.

Standard 5: Projects accept and make referrals directly through Coordinated Entry. Projects actively participate in the CoC-designated Coordinated Entry processes as part of streamlined community-wide system access and triage.

Standard 6: Projects ensure that exits to homelessness are avoided to the extent possible. In instances when a project can no longer serve particular households, the project utilizes alternate programs and the coordinated entry process to ensure that those individuals and families have access to other housing and services, and do not become disconnected from services and housing.

INCORPORATING THE EXPERTISE OF PERSONS WITH LIVED EXPERIENCE (PWLE): Each recipient and subrecipient of CoC/ESG funding must, to the maximum extent possible, involve persons with lived experience/expertise of homelessness into project design/delivery, as well as involvement through employment; volunteer services; or otherwise in operating or providing supportive services for the project.

- CoC-funded projects:
 - Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided.
 - This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with persons with lived experience/ expertise of homelessness when considering and making policies and decisions.
- At the project level, provider organizations are expected to create their own plans and strategies for incorporating the expertise and perspectives of PWLE into project design and delivery. CoC recipients or subrecipients should take substantive actions to incorporate the input and expertise of persons with lived experience of homelessness into program design, implementation, and improvement. Substantive actions are those that are likely to result in an observable or measurable impact on agency operations or programming. This may include, but is not limited to:
 - Establishing program- or agency- level advisory boards specifically composed of PWLE (who may be current or past participants of the agency) and who also participate in the broader governance;

- Surveying program participants regularly for their feedback on the programs they have participated in;
 - Recruiting, hiring and actively supporting PWLE to work at all levels within their organization, including providing appropriate training and opportunities for advancement.
- ESG-funded projects must follow 24 CFR 576.405. The provisions requiring homeless participation on boards or in an advisory capacity can be fulfilled by ESG Grantees bringing any policy decisions regarding their facility and services to the CoC governing board where homeless participation is already existing. Also, to the maximum extent practicable, Grantees should involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG Project, and in providing services for occupants of facilities assisted with ESG.

As the CoC develops best practices and policies related to the greater incorporation of PWLE in the governance and oversight of the system, additional requirements of programs may be added.

INSPECTIONS Housing leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable standards under 24 CFR 5.703, except that the carbon monoxide detection requirement at 24 CFR 5.703(b)(2) and (d)(6) shall not apply. For housing that is occupied by program participants receiving tenant-based rental assistance, 24 CFR part 35, subparts A, B, M, and R apply. For housing rehabilitated with funds under this part, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J, and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under this part are used for acquisition, leasing, services, or operating costs, 24 CFR part 35, subparts A, B, K, and R apply. Additionally, for tenant-based rental assistance, for leasing of individual units, and for sponsor based rental assistance where not all units in a structure are or will be assisted, the standards apply only to the unit itself, and to the means of ingress and egress from the unit to the public way and to the building's common areas.

(1) Before any assistance will be provided on behalf of a program participant, the recipient, or subrecipient, must physically inspect each unit to assure that the unit meets 24 CFR 5.703. Assistance will not be provided for units that fail to meet 24 CFR 5.703, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.

(2) Recipients or subrecipients must inspect all units at least annually during the grant period to ensure that the units continue to meet 24 CFR 5.703.

(3) The requirements in 24 CFR 5.705 through 5.713 do not apply.

❖ **FOR ESG FUNDED PROJECTS:**

Lead-based paint remediation and disclosure. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

Minimum standards for emergency shelters. Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The recipient may also establish standards that exceed or add to these minimum standards.

(1) **Structure and materials.** The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.

(2) **Access.** The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 *et seq.*) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 *et seq.*) and 28 CFR part 35; where applicable.

(3) **Space and security.** Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.

(4) **Interior air quality.** Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

(5) **Water supply.** The shelter's water supply must be free of contamination.

(6) **Sanitary facilities.** Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

(7) **Thermal environment.** The shelter must have any necessary heating/cooling facilities in proper operating condition.

(8) **Illumination and electricity.** The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

(9) **Food preparation.** Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

(10) **Sanitary conditions.** The shelter must be maintained in a sanitary condition.

(11) **Fire safety.** There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents.

All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

Minimum standards for permanent housing. When ESG funds are used for permanent housing under 24 CFR 576.105 or 576.106, the minimum standards in 24 CFR 5.703 apply, except that:

(1) **Definition of HUD housing.** For the purposes of ESG, "HUD housing" in 24 CFR 5.703 means the program participant's unit, systems equipment that directly services those units, items and components within the primary and secondary means of egress from those units' doors to the public way, and common features related to the program participant's use of the building (e.g., the laundry room, community room, mail room).

(2) **Housing inspections.** For the first 30 days in which a program participant receives homelessness prevention assistance, the recipient or subrecipient may provide services under 24 CFR 576.105(b) to help the program participant remain in their unit without inspecting the unit to determine whether it meets the minimum standards identified in this paragraph (c), except that the recipient or subrecipient must still comply with the requirements under 24 CFR part 35. Before otherwise using ESG funds under 24 CFR 576.105 or 576.106 to help a program participant remain in or move into specific housing, however, the recipient or subrecipient must inspect that housing to confirm that it meets the requirements in this section. In addition, recipient or subrecipient must inspect the housing at least once every 12 months during the period of assistance to confirm the housing continues to meet the minimum standards in this paragraph (c).

(3) **Correction of deficiencies.** If an inspection reveals one or more deficiencies that prevent the housing from meeting the requirements in this section, ESG funds must not be used under 24 CFR 576.105 or 576.106 with respect to that housing unless the owner corrects the deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.

(4) **Rental arrears.** Housing for which rental arrears are paid is only subject to the requirements in this section, if a program participant is seeking to stay in that housing.

(5) **Additional standards.** The recipient may also add standards that exceed these minimum standards.

(6) **Other exemptions from 24 CFR part 5, subpart G.** The requirements in 24 CFR 5.703(b)(2) and (d)(6) and 5.705 through 5.713 do not apply.

❖ **FOR CHALLENGE FUNDED PROJECTS:**

When Challenge funds are used for permanent housing, for program participants receiving homelessness prevention assistance, the subrecipient may provide services to help the program participant remain in their unit without inspecting the unit to determine whether it meets the minimum standards.

Before otherwise using Challenge funds to help a program participant remain in or move into specific housing, however, the subrecipient must inspect that housing to confirm that it meets the minimum standards for permanent housing requirements in this section. In addition, subrecipient must inspect the housing at least once every 12 months during the period of assistance to confirm the housing continues to meet the minimum standards.

If an inspection reveals one or more deficiencies that prevent the housing from meeting the requirements in this section, Challenge funds must not be used with respect to that housing unless the owner corrects the deficiencies within 30 days from the date of the initial inspection and the subrecipient verifies that all deficiencies have been corrected.

LIMITED ENGLISH PROFICIENCY All subgrantees should take reasonable steps to ensure meaningful access to their projects and activities by individuals with Limited English Proficiency, regardless of the language spoken. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Grantees must follow the requirements outlined in 24 CFR 576.407(b). HUD published Final Guidance to Federal Financial Assistance Requirements Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons in the Federal Register on January 22, 2007 (72 F.R. 2732).

MATCHING FUNDS CoC-funded projects must follow 24 CFR 578.73 Matching requirements. DCF funded projects should refer to the application and regulations associated with their contract year.

PERFORMANCE MEASURES All projects are expected to strive to meet CoC Performance Goals as outlined in the CoC/ESG quarterly monitoring reports and/or the CoC renewal evaluation standards. Some performance goals are universal across all project types, while some are project type specific. Performance measures by project type are provided below under Standards by Project Type.

POINT IN TIME COUNT PARTICIPATION All subgrantees must participate in the annual point-in-time count, including participation in the unsheltered count if needed. This includes:

- Participation in the Sheltered PIT Count entails ensuring all HMIS data is complete and up to date.
- A) Victim Service Providers, B) non-CoC/ESG funded projects not participating in HMIS, and C) HMIS-participating projects for which data is not current/updated will be asked to complete and submit Sheltered PIT forms.
- Participation in the Housing Inventory Count entails completing and submitting the CoC's Housing Inventory Count survey.
- Participation in the Unsheltered PIT Count entails a) serving as the county unsheltered PIT Count coordinator leading efforts to plan and execute the unsheltered count if no other county coordinator has been identified, including submitting the county's data to the CoC; and/or b) participating as a volunteer on the day and/or night of the unsheltered count.

Prioritization Prioritization standards for Emergency Service Projects (HP, SO, ES and TH) and Housing Projects (RRH and PSH) are aligned with the CoC's Strategic Plan and HUD policy guidance.

The Keys to Home CoC CE System (CES) provides the platform for projects to adhere to the prioritization standards that follow. The CES is required to provide a tool for evaluating households' chronicity, medical vulnerability, acuity, and ability to address their own housing instability.

The CoC has adopted HUD Notice CPD-16-11 on Prioritizing Persons Experiencing Chronic Homelessness and other Vulnerable Homeless Persons. While designed to provide guidance on PSH enrollments specifically, the CoC believes these prioritization strategies provide guidance that also aligns with their local priority and are therefore applicable across the CoC's housing interventions. The overarching goal of this Notice is to ensure that those individuals and families who have spent the longest time in places not meant for human habitation, in ES, or in safe havens, and who have the most severe service needs within a community are prioritized.

Housing Projects should utilize the CES tools and processes, specifically case conferencing, to identify the highest priority households that meet their eligibility criteria. Every household must first meet the project eligibility criteria. **It is the responsibility of the enrolling project to ensure that referred households are eligible and to either update the household record or inform CES staff when households are identified as ineligible.**

The prioritization process uses a combination of factors including the following:

- a. VI-SPDAT score (0-3 Community Resources/Diversion; 4-7 RRH; 8+PSH)
- b. Length of time of homelessness
- c. Unsheltered homelessness or staying in non-congregate shelter
- d. Vulnerability to illness or death, including COVID-19
- e. Significant challenges or functional impairments, including any physical, mental, developmental, or behavioral health disabilities regardless of the type of disability, which require a significant level of support to maintain permanent housing
- f. High utilization of crisis or emergency services
- g. Vulnerability to victimization, including physical assault, trafficking, or sex work
- h. Risk of continued homelessness

Priority factors will be identified by information collected from the VI-SPDAT as well as other collateral information provided by the household or provider (e.g. physician, social worker, assessor, outreach worker, etc.).

Households who are unsheltered, or residing in non-congregate shelter, will be a priority for housing.

The following factors will apply as tie-breakers when necessary:

1. Length of Time Homeless
2. VI-SPDAT score
3. Presence of other priority factors (e-h)

Permanent Supportive Housing (PSH) will be reserved for chronically homeless individuals and families when it is available.

PROJECT EVALUATION CoC projects are evaluated annually through the local CoC renewal funding competition process. Underperforming projects may be required to develop a quality improvement plan, receive technical

assistance from the CoC, and/or have their funding reallocated in order to fund new projects, depending on the circumstances.

- ESG projects are evaluated through the CoC/ESG quarterly monitoring reports. KTH CoC reviews all ESG grantee invoices to ensure eligible expenses are incurred and monitors all of its ESG subrecipients.

Transfers

- **Emergency Transfers:**
 - Projects must follow the CoC's **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking.**
 - In accordance with the VAWA, KTH CoC homeless assistance Projects providing housing or rental assistance must allow participants who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to request an emergency transfer from the participant's current unit to another unit. This requirement applies to Projects receiving Continuum of Care (CoC) or Emergency Solutions Grant (ESG) funding.
 - CoC/ESG providers will work with KTH CoC's CES to enact an emergency transfer through resources beyond those available within the provider's own organization. The ability of the KTH CoC's CES to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and on whether another dwelling unit is available and is safe to offer the participant for temporary or more permanent occupancy.
 - A participant is eligible for an emergency transfer when any member of the household is a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements of the policy.
 - For households receiving tenant-based rental assistance, the following procedures will be followed for non-transferring household member(s), if the household separates in order to affect an emergency transfer:
 - For households living in units that are otherwise assisted, the required policies must provide that for project participants who

qualify for an emergency transfer, the household shall have priority over all other applicants for rental assistance, TH, and PSH projects funded through the CoC provided that the household meets all eligibility criteria required by Federal law or regulation or HUD NOFO; and the household meets any additional criteria or preferences established in accordance with Fair Housing 24 CFR 578.93(b)(1), (4), (6) or (7) .The households shall not be required to meet any other eligibility criteria or preferences for the project. The household shall retain their original homeless or chronically homeless status for the purposes of the transfer.

- Please see **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking** for information on: Emergency Transfer Request Documentation, Confidentiality, Emergency Transfer Timing and Availability, and Protocol for Transfer Request.
- **Transfers from one project model to another (RRH to PSH)**
 - Project transfers may be made from RRH or TH to PSH so long as the household meets the eligibility criteria under the specific project and the requirements for the PSH project in the NOFO for the year the project was awarded.
 - Please note: RRH providers are expected to gather all information necessary to determine if a household meets the chronic homeless definition (disability information and verification of homelessness, within 45 days of project enrollment. These documents should be uploaded to the global client documents within HMIS. Failure to do so will not allow for these households to receive the necessary additional priority for being chronically homeless for transfers.
 - All transfers from one project model to another must begin with an email to the Director of Coordinated Entry requesting the household be reviewed at the next Regional case conferencing meeting. The provider will be expected to present information about why the household needs a transfer, including information about the efforts made by the current provider to meet the household's needs and how the household will benefit from being served by a different provider.
 - Attendees of the case conferencing will determine if the household will be prioritized.

Violence Against Women Act (VAWA)

- Background: The Violence Against Women Act (VAWA), reauthorized in 2022, includes certain housing protections for victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking, who are applying for or residing in HUD funded housing programs, including ESG and CoC programs.
- Changes to the McKinney-Vento Homeless Assistance Act Definition of Homelessness: For ESG and CoC Programs, VAWA 2022 amended Section 103(b) of the McKinney-Vento Homeless Assistance Act to require HUD to consider homeless

any individual or family who:

- (1) is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
 - (2) has no other safe residence; and
 - (3) lacks the resources to obtain other safe permanent housing.
- [HUD VAWA Forms](#): KTH CoC housing providers must provide all households applying for/ participating in ESG or CoC funded housing the following HUD VAWA Forms (which are available on the HUD website) at a minimum:
 - (1) When a household is denied housing assistance from a program;
 - (2) When a household is enrolled in/begins receiving housing assistance from a program;
 - (3) When a household receives a notification of eviction; and
 - (4) When a household is notified their housing assistance is ending / being terminated.
 - [Form HUD-5380 Notice of Occupancy Rights under VAWA](#): informs households of their VAWA housing protections.
 - Form 5382 [Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation](#): is 1 of 4 HUD-approved ways of documenting a person's status as a victim of a crime that VAWA protects. Housing providers must accept Form HUD-5382 / self-certification as sufficient documentation, and may not ask for nor require additional documentation to prove a participant's victim status.
 - [Form HUD-5383, Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking](#): may be used by participants to request an emergency transfer and certify that they meet the conditions for an emergency transfer under the Violence Against Women Act ("VAWA").

Lease Bifurcation and Removal:

A housing provider may bifurcate a lease in order to remove the abuser or perpetrator from the lease in order to evict or terminate assistance to the household member who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, human trafficking, or stalking against another member of the household. The housing provider may not take away the rights of other eligible tenants to the unit or otherwise punish the remaining tenant(s)/ victim(s) of the abuse/ violence. The Housing Provider must follow Federal, State, and local eviction procedures in order to remove the abuser or perpetrator from the household. In order to divide a lease, the Housing Provider may, but is not required to, ask the victim for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, human trafficking, or stalking.

If the evicted abuser or perpetrator was the sole tenant to have established eligibility for

assistance under the program, the housing provider must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

If a housing provider bifurcates a lease to remove a household member who would otherwise be eligible under the household's current program, the housing provider is required to provide a 90-calendar-day period, as long as the period does not extend beyond the duration of the lease, for the household member who is being removed to do one or more of the following:

- To establish their eligibility under the same program; or
- To establish eligibility under another covered housing program, including, but not limited to, another CoC or ESG program, the housing choice voucher program; or
- to find alternative housing.

Housing providers may, at their discretion, extend that 90-day period by another 60 days. Regardless of its length, the period cannot extend beyond the duration of the lease. This requirement creates a window in which the household member who is being removed has priority access to the same program under which they have been served to date or to another housing program. This requirement is about promoting the work of CoC and ESG recipients to ensure that all people have access to safe, stable housing, part of which is working to ensure that people exit CoC and ESG programs to other permanent housing, regardless of the circumstances under which they're exiting.

When a victim and the rest of their household determine that moving to a new unit is their best way to achieve safe housing, the household member who is being removed/bifurcated out may remain in the original unit. The household member who is being removed/ bifurcated out is responsible for establishing their eligibility under either the existing program or another housing program to identify whether their original unit will continue to receive a subsidy, which is not guaranteed. Programs should not be terminating the removed household member except under the most serious circumstances, and programs should make efforts to rehouse the removed household member.

C. HOUSING-FOCUSED CASE MANAGEMENT

CASE MANAGEMENT STANDARDS FOR ALL PROJECTS

OVERALL JOB DESCRIPTION AND DUTIES Every Case Manager should have a written job description detailing their major responsibilities and required/preferred qualifications. Case Managers should demonstrate an ability to work with diverse populations, presenting with a wide variety of needs. **Typical case management responsibilities, at a minimum, facilitate the following:**

- Development of a **Housing Stability Plan** with households. Plans are highly participant-driven without predetermined goals, and should build on each participant's needs, goals, and strengths. The Housing Stability Plan should be reviewed monthly and revised, at a minimum, every 3 months. More frequent revisions will be needed during times of acute crisis.
- Creative problem solving to help households to self-resolve their housing crisis.
- Linkage to community-based services per the Housing Stability Plan.
- Help households address issues that may impede access to housing (such as credit history, arrears, and legal issues).
- Assist households with finding, moving into and maintaining housing. This may include

engaging landlords and working closely with landlords to facilitate participant move-in and ongoing success in housing.

- Inform households of their eligibility for educational services and ensure children enrolled in the project are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start and Education for Children and Youth Experiencing Homelessness programs authorized under Subtitle VII of the McKinney Vento Homeless Assistance Act.
- Make appropriate and time-limited services and supports available to families and individuals to allow them to move quickly to permanent housing and/or retain permanent housing.
- Collect required documentation, per funder requirements.
- Provide or assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals. This includes providing or ensuring that the household has access to resources including childcare, education, employment and job training, financial literacy, health, legal services, public benefits access, substance use recovery, and transportation, among others (if needed and appropriate) so that they can sustain permanent housing upon exit. This includes providing advocacy on behalf of households as needed to access necessary services.
- For scattered site projects: assist with housing location, lease negotiation, determining rent reasonableness, and inspection.
- For SSO, ES, and TH projects: Help households identify and select among various permanent housing options based on their unique needs, preferences, and financial resources.

PRINCIPLES OF CASE MANAGEMENT

- Person-Centered
 - Case Managers practice a person-centered approach that “ensures that the person who has experienced homelessness has a major say in identifying goals and service needs, and that there is shared accountability. The goal of case management is to empower people, draw on their strengths and capabilities, and promote an improved quality of life by facilitating timely access to the necessary supports, thus reducing the risk of homelessness and/or enhancing housing stability.” Services should be participant- directed, highly individualized and tailored to participant’s needs, respectful of individuals’ rights to self-determination, and voluntary. Case Managers should be trained in person-centered case management strategies including Trauma-Informed Care, Motivational Interviewing, Critical Time Intervention, among others.
- Trauma-informed care
 - Trauma-informed care is an organizational structure and framework that involves understanding, recognizing, and responding to the effects of all types of trauma. It emphasizes physical, psychological and emotional safety for both participants and providers, and helps participants rebuild a sense of control and empowerment. Trauma-informed care operates with the following principles:
 - **Consumer empowerment:** Using individuals’ strengths to empower them in the development of their goals;
 - **Choice:** Informing consumers regarding Project and housing options so they can choose the options they prefer;
 - **Collaboration:** Maximizing collaboration among staff, participants and their families in organizational and individual goal planning;
 - **Safety:** Developing healthy home settings and activities that ensure consumers’ physical and emotional safety; and
 - **Trustworthiness:** Creating clear expectations with consumers about what

proposed Projects entail, who will provide services, and how supports will be provided.

- Progressive engagement
 - Progressive Engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without assistance.
 - Progressive engagement recognizes that there is no way to accurately predict how much help someone may need to end their homelessness and avoid a return to the streets or shelter. While we know that many people can successfully exit homelessness and avoid immediately returning with a small amount of assistance, we also know that there are no dependable predictors to guide the amount of assistance needed. In this approach, participants are initially offered “light-touch” assistance, including help creating a reasonable housing placement/stabilization plan, housing information and search assistance, and limited financial assistance (first month’s rent, security deposit, short-term rental assistance). Progressive engagement may involve more frequent contacts during a participants’ early time in the project. All participant check ins should include a discussion of the housing stability plan to review progress, barriers and supports needed.
 - Projects using Progressive Engagement regularly reassess housing barriers and seek to close cases as soon as housing retention barriers are resolved. Projects should strive to provide the minimum level assistance necessary (i.e., lightest possible touch or just enough) for the shortest time possible to achieve housing stability.

FREQUENCY The frequency of case management services depends on the unique needs and situation of every project participant. Case Managers should be in direct contact with their participants at least once a month. The frequency of direct contact may increase due to the household’s homeless status, acute needs, and overall lack of housing stability. In-person meetings with participants are preferred. Additional details about case management frequency can be found in the subsequent Project sections. The level of Case Management support is to match the needs of the household, addressing factors that can negatively impact housing stability. As such, the intensity of Case Management frequency, duration, and support can and will change over time.

Case management is always offered to anyone enrolled in programming and is strengths-based, trauma-informed, progressive, culturally competent, and person-centered. It is the participants’ right to choose their level of involvement, and case management is an integral part of establishing stabilization when permitted to be incorporated. Those receiving Rental Assistance and/or Financial Assistance will always be offered case management.

LOCATION/TIMING Case management should occur at whatever location works best for the participants. While home-based visits are ideal for persons residing in scattered-site housing, case management can also occur in the office or in the community. Case management hours can also be flexed to be able to meet a participant before or after "typical" working hours.

DURATION As described in “TERMINATION OF ASSISTANCE” section, Projects must use judgement and examine all extenuating circumstances in determining that a violation should result in termination, so that assistance is terminated in only the most severe cases. Every effort should be made to allow the participant to remain in the project until housing stability or alternate housing resources are obtained.

The KTH CoC expects that case managers will maintain a reasonable caseload to adequately provide quality case management services to each program participant interested in supportive services. The table below serves as guidance on recommended caseloads, understanding that service needs vary among individuals and families.

Acuity	Typical Project Types	Recommendation
Low	Diversion Homeless Prevention Street Outreach Emergency Shelter	40-50 cases at a time
Medium	Street Outreach Emergency Shelter Rapid Rehousing Tenant-Based Rental Assistance Housing-Focused Case Management	25-40 cases at a time
High	Intensive Case Management Permanent Supportive Housing	15-25 cases at a time

D. STANDARDIZED ASSESSMENT

All individuals 18 years of age or older will be assessed using a comprehensive, universal assessment tool called the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT). This assessment is used to assist in prioritization and fully understanding the unique dynamics to each households' situation, service and housing needs. This tool, paired with case conferencing, ensures that the assessment of a household's level of need and eligibility determinations are made in an informed, consistent, and objective manner.

E. HOMELESS MANAGEMENT INFORMATION SYSTEM

The KTH CoC requires all subgrantees to collect Universal Data Elements and Program Specific Data Elements on program participants receiving assistance via the Homeless Management Information System (HMIS) run by the Continuum of Care. Additionally, all services and financial assistance provided to participants must be documented in the HMIS database. All Projects, apart from projects operated by Victim Service Providers (VSPs), must enter data into the HMIS database accurately and in a timely manner (defined as within the HMIS policies and procedures). Projects operated by VSPs must enter data into a comparable database accurately and in a timely manner and make their aggregate data available to the CoC for planning, monitoring, and ranking. Data collection must be compliant with the most current version of HUD's HMIS Data Standards.

Projects should use this data to measure project outcomes and identify areas for improvement. Non-CoC funded projects are also encouraged to track project data using HMIS or a DV comparable database. Projects should reference the most updated HMIS Policies and Procedures for additional guidance.

HMIS and physical files are the two ways program participant information is stored. HMIS usernames should never be shared with anyone, including coworkers. HMIS should not be accessed on public Wi-Fi. Files are to be stored in a locked file with the key in a secure location. Files are never to be taken outside the office without being properly stored and locked or left unattended in vehicles.

Program participant information may only be shared with outside agencies with a signed release of information. Upon intake, program participants should be asked to sign an HMIS release and any other necessary releases of information. These releases should be maintained in the program participant file, both electronically through HMIS as well as in the physical file. Within the organization, program participant information should only be discussed on a need-to-know basis, and never be shared in a public setting (e.g., waiting room, hallways, common areas), or in an email including identifying information.

Program participant information should never be viewable in front of other program participants. For example, program participant information should never be left on top of a desk, on a copier/printer, or in some other shared area. This includes

viewing other participant information on a computer screen that is in the line of sight of another participant.

Program participants have a right to request their information including HMIS releases, case management forms, program participant complaint process, etc. as required by HMIS regulations. Program participants can complete a release of information for their own records. Record requests should be provided within a reasonable timeframe.

ENROLLMENT AND HMIS PROJECT START DATE: Project enrollment should be based on eligibility and CE prioritization, **not other factors such as residency.**

Project start date in HMIS is based on project type:

- Street Outreach: Date of first contact with the client.
- Emergency Shelter: Night the client first stayed in the shelter. Night by Night (NbN) shelters will have a 'Project Start Date' and will allow clients to re-enter as necessary without "exiting" and "restarting" for each stay for a specified period.
- Transitional Housing: Date the client moves into the residential project (i.e., first night in residence).
- Permanent Housing, including Rapid Re-Housing: Date the client was admitted into the project. To be admitted indicates the following factors have been met:
 - Information provided by the client or from the referral indicates they meet the criteria for admission;
 - The client has indicated they want to be housed in this project; and
 - The client is able to access services and housing through the project. The expectation is the project has a housing opening (on-site, site-based, or scattered-site subsidy) or expects to have one in a reasonably short amount of time.
- Other Service Projects (including but not limited to: Services Only, Day Shelter, Homelessness Prevention, Coordinated Entry): Date the client first began working with the project and generally received the first provision of service.

F. PROVIDER REQUIREMENTS

1. When providers do not offer specific services, they must coordinate to the extent possible with other targeted homeless services within the CoC that do.
2. Providers should be familiar with the SOAR process and, where possible, have at least one full-time staff member SOAR-trained.
3. Providers must coordinate with mainstream resources in the CoC including housing, social services, employment, education, and youth programs for which participants may be eligible.
4. Providers must have written policies and procedures and must consistently apply them to all participants.
5. Programs receiving KTH CoC funding must participate in HMIS (Homeless Management Information System), and all homeless programs are strongly encouraged to participate in HMIS. Programs must meet minimum HMIS data quality standards.
6. Programs providing domestic violence or legal services may opt out of HMIS participation but must utilize a comparable database to collect HUD required data elements.
7. Programs must participate in the Coordinated Entry System initiative by signing a Memorandum of Understanding with the KTH CoC. All housing referrals will be generated through the CE system. When program openings exist, ESG-funded programs are obligated to accept referrals only through the CE process and must have a representative actively participating in case conferencing to accept prioritized referrals. Refused referrals will follow the process as indicated in the Coordinated Entry System Policy and Procedures.
8. Programs will utilize a housing-first and housing focused approach in program administration.
9. 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.

10. Programs must have a formal procedure for terminating assistance to a participant that recognizes the rights of the participant(s) involved. Programs must allow participants the opportunity to dispute termination. Termination does not necessarily preclude assistance at a future date. Terms and conditions for termination must be shared with the participant upon intake.
11. Programs must make known that use of the facilities and services are available to all participants on a nondiscriminatory basis.
12. Programs may not engage in inherently religious activities such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. These activities can be conducted but must be separate and voluntary for program participants.

G. RECORDKEEPING

All Projects should maintain records in keeping with the following basic standards. All services and financial assistance provided to participants must be documented in the HMIS database. In addition, Project providers must maintain documentation as required by the specific Project regulations and any other recordkeeping requirements as stated in Subgrantee Agreements:

FINANCIAL RECORDKEEPING REQUIREMENTS

- Documentation of all costs charged to the grant
- Documentation that funds were spent on allowable costs
- Documentation of the receipt and use of project income
- Documentation of compliance with expenditure limits and deadlines for expenditure
- Retain copies of all procurement contracts as applicable
- Documentation of amount, source and use of matching resources

Records must be retained for amount of time prescribed by applicable funding source

- ESG requirements provided in 24 CFR 576.500 - Recordkeeping and Reporting Requirements.
- CoC requirements provided in 24 CFR 578.103 Recordkeeping Requirements.

PARTICIPANT RECORDKEEPING REQUIREMENTS

CE PARTICIPATION Documentation of project entrance through CE, including chronic homeless status, severity of service needs and housing needs as measured by the assessment tools, and length of time homeless.

GENERAL ELIGIBILITY All Projects must evaluate and document individuals' and family's eligibility per the HEARTH Homeless Definition Final Rule **PRIOR** to project entry. The specific Categories of homeless eligibility and required documentation are provided with each Project type.

GOAL PLANS/HOUSING STABILITY PLANS A record of services and assistance provided to each participant, including initial and updated goal plans.

INFORMED CONSENT/CONFIDENTIALITY Relevant releases of information must be kept in each case file, including, but not limited to, the **Keys to Home HMIS Release of Information**. Projects must have written confidentiality/privacy standards with respect to their files, information sharing and personally identifying data maintained in HMIS. A notice should be made available to participants upon intake and upon request. Records containing personally identifying information must be kept secure and confidential.

HOUSING/HOMELESS STATUS Homeless or at-risk statuses must be documented for all programming. Documentation must be collected for all required adult household members. Housing/homeless status documentation must be dated within the last 30 days (unless

specified otherwise under program regulations (e.g. ESG, TANF) and should be consistent with the participant's date of project enrollment. The priority for obtaining evidence, in order of preference, is as follows:

- Third-party documentation
- Intake worker observations (written verification of observations required, along with additional information, such as photographs, as feasible).
- Self-Certification from the person seeking assistance (if this option is utilized, there must also be a written record of intake worker's due diligence to obtain above evidence).

However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to ES, receiving SO services, or being immediately admitted to shelter or receiving services provided by a victim service provider, as defined in section 401(32) of the McKinney-Vento Homeless Assistance Act, as amended by the HEARTH Act. 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 entries are made.

For individuals exiting an institution where they stayed less than 90 days and were experiencing homelessness prior to entering the institution one of the forms of evidence above to document prior homelessness AND:

- Discharge paperwork or written/oral referral; or
- Written record of intake worker's due diligence to obtain above evidence AND certification by the individual that they exited the institution.

INCOME DOCUMENTATION Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income is defined as all amounts, monetary or not, which:

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in paragraph (c) of this section.
- Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Annual Income should be calculated considering:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation of a business (i.e., total revenue minus business operating expenses). This also includes any withdrawals of cash from the business or profession for your personal use.
- Monthly interest and dividend income credited to an applicant's bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
- Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding

special pay for exposure to hostile fire.

- Income of Full-Time Students: The employment income of full-time students 18 years or older (excluding the head of household and spouse) in excess of \$480 is not counted in the annual income calculation.

Documentation must be collected for all required adult household members. Income documentation must be dated within the last 60 days (unless specified otherwise under program regulations (e.g. ESG, TANF), and should be consistent with the participant's date of project enrollment. Income will be verified through bank statements, award letters and/or recent paystubs when possible. When this is not possible, a letter from the employer, stating wages, will also suffice.

In the event that there is no way to verify income at time of enrollment or reassessment, or in cases when there is no income to document, a **Self-Declaration of Income Form** will be completed. The latter is a last resort for individuals with an income and will indicate why alternate proofs of income were not available.

Once determined, the following indicate how income should be documented within HMIS:

- When a participant has income, but does not know the exact amount, a "Yes" response should be recorded for both the overall income question and the specific source, and the income amount should be estimated.
- Income received by or on behalf of a minor child should be recorded as part of household income under the Head of Household, unless the federal funder in the HMIS Project Specific Manual instructs otherwise. Income should be recorded at the client-level for heads of household and adult household members.
- Income data should be recorded only for sources of income that are current as of the information date (i.e., have not been specifically terminated). For example, if a participant's employment has been terminated and the participant has not yet secured additional employment, the response for Earned income would be "No."

If there is a change to expected project/participant contributions, reasons for such a change should be explained in case notes, and other documentation might be required to justify the change (proof of payment for unexpected expenditure, loss of job, etc.).

Income Calculation

After determining and documenting specific sources of current income that must be included in the calculation for each household, subgrantees then calculate the household's (not just the head of household's) annual income.

Subgrantees must have policies and procedures that describe how they annualize wages and periodic payments. All staff who are verifying eligibility need to be trained on these policies.

When calculating income based on hourly, weekly, or monthly payment information, add the gross amount earned in each pay period for which there is documentation and divide by the number of pay periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- Hourly Wage multiplied by hours worked per week multiplied by 52 weeks
- Weekly Wage multiplied by 52 weeks
- Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods

- Monthly Wage multiplied by 12 months

Subgrantees may choose between the following two methods of calculating annual income:

- A. Project annual income by annualizing current income, OR
- B. Use available information to average anticipated income from all known sources, including those that are active during only part of the year

For income that has an annual cap, subgrantees should not annualize benefits/pay beyond the maximum level that can be received.

For example, a person receives \$100 of unemployment benefits each week, but unemployment income is capped in your state at \$4,000 per year. For the income calculation, annualized unemployment benefits will therefore be \$4,000, not $\$100 \times 52 = \$5,200$. As another example, the person receives \$500 weekly during only one quarter in the year. A person's annualized pay should be \$6,000, not $\$500 \times 52 = \$26,000$. This is because there are 12 weeks in a quarter and in the example, the participant only earned \$500 per week for one quarter. The calculation would be $12 \times \$500 = \$6,000$.

When determining a household's financial resources, future income should be taken into account to the extent that it is predictable. Remember that subgrantees should assess all circumstances and demonstrate that without financial assistance, the household would become homeless or remain homeless. Case managers should carefully assess the circumstances and probability of future income.

It is also important for subgrantees to conduct a new income calculation if a participant's household income is reduced between initial eligibility determination and recertification to ensure that they have access to resources for which they may be eligible.

Documentation of the household's annual income, and the percentage of AMI or Federal Poverty Level (TANF Grant only) that this income represents, must be recorded in the participant's case file as documentation of eligibility.

TERMINATION As mentioned in the "TERMINATION OF ASSISTANCE" section, the termination process with a participant must be well documented. To terminate rental assistance or housing relocation and stabilization services to a Project participant, the required formal process, at a minimum, must consist of:

- Providing the project participant with a written copy of the project rules and the termination process before the participant begins to receive assistance;
- Written notice to the project participant containing a clear statement of the reasons for termination;
- A review of the decision, in which the project participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the project participant.

H. TERMINATION OF ASSISTANCE

Projects should have a formal procedure for terminating a participant's assistance that recognizes the

rights of the participant(s) involved:

- Eviction by a landlord in a scattered site project should not result in termination from the ESG/CoC project.
- Projects must use judgement and examine all extenuating circumstances in determining whether a violation should result in termination. Projects should make multiple, documented attempts to bring the household into compliance with their lease or occupancy agreement. Assistance should only be terminated in the most severe cases, when no other viable alternative is available, and when interventions supporting the household to remain in the project have been unsuccessful.
- Every effort should be made to allow the participant to remain in the project.
- Termination does not preclude assistance at a future date, unless approved by the CoC Lead Agency
- Termination should not result in a return to homelessness, instead households should be brought back to the CES case conferencing for case staffing before being referred either back to the CoC's CES for enrollment into an appropriate project or to another non-CE-related resource pursuant to their level of need.

Possible reasons for termination:

- Termination will occur if the qualifying member of the household:
 1. Is institutionalized or incarcerated for 90 days or more (PH Projects only);
 2. Moves out of the service area;
 3. Voluntarily exits the project; or
 4. Passes away
- Termination may also occur if the participant has moved out of their unit and the project is unable to make contact with the participant. The project should make multiple attempts, using different methods (such as phone, in-person visits, and written notice) to make contact with participants.
- Participants who are repeatedly given notices from their landlord or provider organization for non-payment of their portion of the rent, damaging the unit, harassing other tenants, criminal activities, or continued lease violations despite warnings may be terminated from the project. In the spirit of the supportive aspects of homeless assistance projects, the agency will document reasonable efforts and interventions that demonstrate attempts to encourage participants' compliance with project rules and expectations. Project termination should be seen as a last resort.
- In some severe cases (e.g., violence, or serious threats of violence, toward Project staff, volunteers or other participants/tenants; unable to live safely alone/ unsupervised in their home)), termination from the project may be immediate.
- Projects with operating or leasing dollars that utilize occupancy agreements or subleases with participants must follow applicable landlord/ tenant laws when terminating a household's assistance.

Further per 24 CFR 576.402 – Terminating Assistance (ESG) and 24 CFR 578.91 (CoC):

- In general: If a project participant violates project requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgement and examine all extenuating circumstances in determining when violations warrant termination so that a project participant's assistance is terminated only in the most severe cases.
- Project participants receiving rental assistance or housing relocation and stabilization services: To terminate rental assistance or housing relocation and stabilization services to a project participant, the required formal process, at a minimum, must consist of:
 - Providing the project participant with a written copy of the project rules and the

- termination process before the participant begins to receive assistance;
- Written notice to the project participant containing a clear statement of the reasons for termination;
- A review of the decision, in which the project participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the Project participant.

Participants receiving a Notice of Termination may request that the decision to terminate participation be reviewed by requesting the designated supervisor at the subrecipient organization. This request must be made in writing and must be reviewed within 14 calendar days. A written notice of the final decision will be issued to the participant.

I. COC OPERATION STANDARDS BY PROJECT TYPE

The following Standards apply to HUD and KTH CoC-funded projects other than Emergency Solutions Grants and TANF programs. ESG Written Standards are in the next section of the document (Section M). Examples of HUD and KTH CoC-funded projects include CoC Program and Challenge. These standards denote when the regulation specifically applies to CoC Program funding. Multiple funding sources can pay for each of these activities, so subrecipients should be careful to note each funding source's requirements. Performance measures can be found in the table below and apply to all KTH funding.

PERFORMANCE MEASURES

Activity	Outcome/Outputs
Diversion	Number of Persons: 1) Who avoid admittance to Emergency Shelter for 30 days or more, from the time of diversion assistance
Homelessness Prevention	Number of Persons: <ul style="list-style-type: none"> • Who maintained their permanent housing for 6 months or longer • Exiting to and/or retaining permanent housing destinations • With higher income at program exit • With more non-cash benefits at program exit • Participating in Case Management
Street Outreach	Number of Persons: <ul style="list-style-type: none"> • Placed in shelter or transitional housing, within 30 days of enrollment • Exits to permanent housing • With more non-cash benefits at program exit • Participating in case management
Emergency Shelter	Number of Persons: <ul style="list-style-type: none"> • Exiting to temporary or transitional housing destinations • Exiting to permanent housing destinations • Participating in case management
Transitional Housing	Number of Persons: <ol style="list-style-type: none"> 1. Exiting to permanent housing destinations 2. Attaining or increasing non-cash assistance or mainstream benefits 3. Attaining or increasing income 4. Number of persons participating in housing focused case management

Rapid Re-Housing	Number of persons: <ul style="list-style-type: none"> • Who maintained their permanent housing for 6 months or longer • Exiting to and/or retain permanent housing destinations • With higher income at program exit • With more non-cash benefits at program exit • Participating in Case Management
Permanent Supportive Housing	Number of persons: <ul style="list-style-type: none"> • Maintaining permanent housing for 12 months or longer • Attaining or increasing non-case assistance of mainstream benefits • Attaining or increasing income • Paired with supportive services • Paying 30% of their monthly income towards rent.

HOMELESSNESS PREVENTION (HP)

Homelessness Prevention serves individuals and families who are at risk of becoming literally homeless. **Currently, no HUD CoC Program funds can be utilized for Homelessness Prevention as those are only designated for High Performing Communities.** These standards apply only to Homelessness Prevention projects funded under other federal, state, and local sources.

Eligibility Criteria

The following categories of individuals or families are eligible for HP services:

- Category 2: Imminent Risk of Homeless; or
- Category 4: Fleeing/Attempting to Flee Domestic Violence*; or
- At-risk of homelessness as defined at 24 CFR 576.2; AND
- Households must be very-low income: gross annual income must be less than 30% of area median income based on the income limits most recently published by HUD.
- **FOR CHALLENGE GRANT ONLY:**
 - Gross annual income must be less than 80% of area median income based on the income limits most recently published by HUD.
 - For participants who may be seeking **utility or deposit services only at entry**, the household must show a need for deposit or utility services (e.g. disconnection notice, deposit letter) AND meet income eligibility listed above.

***A household that qualifies as homeless under Category 4 but does not live in an ES or other place described in paragraph (1) of the 'homeless' definition would not be eligible for ESG rapid re-housing assistance but may be eligible for ESG HP assistance.** Additionally, if the household meets the criteria under either Category 2 or 3 of the homeless definition or the criteria under the at-risk definition, the household may be eligible for HP assistance.

Note: not all HP households will remain in the same unit. Some may require relocation services (for example, if a landlord still wants to evict even if payment is offered). In these cases, no arrears should be paid, and the household should be rehoused within the HP project (as opposed to RRH).

Participant Transfers (non Emergency Transfer Requests): Transferring participants from HP project to HP project should only happen in rare and limited instances (e.g. one project has run out of funds, and household needs continued services). Subgrantees should budget accordingly to ensure that enrolled participants can be served for the duration of the grant period, if needed. Additionally, participants should be fully assessed at entry to ensure the proper placement in an HP project (e.g. if the assessment shows the household may need medium-term assistance, the subgrantee should not enroll the household in a project that only offers one-time assistance). See CoC HMIS Policies and Procedures for additional guidance about transferring participants in HMIS.

In the instance a household has to transfer projects, subgrantees must complete eligibility screening and any required documentation for the new project the household is being admitted into.

Reevaluation: CoC* and Challenge recipients and subrecipients must conduct regular re-evaluations, **at least every 90 days**, of program participants receiving HP assistance. To continue to receive CoC or Challenge HP assistance, a program participant's reevaluation must demonstrate eligibility based on:

- Lack of resources and support networks. The program participant's household must continue to lack sufficient resources and support networks to retain housing without CoC program assistance.
- Need. The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing.

In addition, an HP re-evaluation must demonstrate:

- Income. The program participant household's annual income must be less than or equal to 30 percent of Area Median Income (AMI).
- **FOR CHALLENGE GRANT ONLY:**
 - Gross annual income must be less than 80% of area median income based on the income limits most recently published by HUD.

All reevaluations must be documented in the HMIS database according to CoC HMIS Policies and Procedures. See CoC HMIS Policies and Procedures for additional guidance.

Documentation

Relevant documentation standards include the information presented in the "Recordkeeping" section of the CoC's Written Standards. Additional documentation standards for this project type include:

- Documentation of Housing Status and income eligibility must be completed and **prior** to enrollment of a household into an HP project.
- Projects must offer a standard, basic level of support to all landlords who lease to project participants as detailed in a written agreement that should be signed by the Case Manager or Housing Locator and the landlord. At a minimum, this agreement should specify that the Case Manager and/or Housing Locator will:
 - Inform the landlord about the amount and duration of financial assistance being provided to the participant;
 - Respond quickly (ideally within one business day) to landlord calls about serious tenancy problems;

- Seek to resolve conflicts around lease requirements, complaints by other tenants, and timely rent payments; and,
 - If necessary, help negotiate move-out terms and assist the participant to quickly locate and move into another unit without an eviction.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The lease must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
 - Signatures of both parties.
 - HUD-91067 VAWA Lease Addendum (*Required for HUD CoC and ESG housing program)
 - Other documents required in all case files:
 - Passed Inspections (Minimum Habitability Standards and Lead-Based Paint, if applicable; e.g. the participant is leaving one unit and moving into another).
 - Rent Reasonableness and/or Fair Market Rent Documentation (*FOR CHALLENGE GRANT ONLY: Units are only required to meet rent reasonableness)
 - Case notes
 - Financial records related to any financial assistance provided to households
 - Any other documents as required by specific program regulations, subgrantee agreements, or the KTH CoC
 - Housing Plans are required. HP Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.
 - If rental arrearages are being paid, there must be proof of funds owed and that the landlord will cease eviction proceedings if paid.
 - If utility arrearages are being paid, there must be proof of pending shut-off or that they are already shut-off, that the household is responsible for utilities per the lease, and that the bill is in the participant's name at the address on the lease.

Assessment

Households will be screened for prevention resources through CE. Access points will complete HP prioritization assessments that evaluate household needs, financial needs, and risk of homelessness. Upon receipt of referral, prevention providers will screen participants for eligibility.

Participants fleeing DV/attempting to flee DV may be eligible for EITHER HP OR RRH resources, per HUD eligibility guidance (*see note under "Eligibility" section for more information). A Victim Service Provider (VSP) may make referrals based on participant choice and resource availability. If referral to prevention resources is appropriate, VSP may make referral to HP resources (including VSP specific resources).

Services

Case managers approach all participants using progressive engagement to provide the "lightest touch" intervention possible. For those who do not obtain permanent housing after the "light touch" services, additional services are added until the

household is able to stabilize. Case managers must show due diligence efforts to meet with participant households at least once per month.

HP staff and the household together create a housing stabilization plan. HP staff provides (or provides referrals to) needed housing stabilization services and mainstream resources, as appropriate. Services typically include, but are not limited to, mediation, legal services, housing navigation, and employment support.

Relevant case management standards include the information presented in the “HOUSING FOCUSED CASE MANAGEMENT” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Income is reassessed quarterly (every 90 days) for the purposes of eligibility and adjusting rental payments. Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Some indicators of stability could be:
 - Goals cited in previously created goal plans will be realized.
 - The household will be paying rent in full (or to the level agreed upon as described above)
 - The housing crisis is resolved
 - The household feels as though they have enough support in place to maintain stabilization without funded essential services.
- Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy.
- Working with households to develop a Housing Stability Plan that includes review of the affordability of the household’s housing unit and the possibility of moving to a more affordable living situation.
- The Housing Stability Plan should be reviewed monthly and revised every 90 days, if needed.
- Provide housing locator services. While the amount of assistance related to housing search varies by provider, at a minimum this should include:
 - Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
 - Provide education and outreach to landlords to address potential barriers to their participation
 - Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
 - Help individuals and families negotiate manageable and appropriate lease agreements with landlords
 - In general, some households may need more intensive assistance with housing search than others, due to barriers to tenancy (such as criminal record) or lack of experience with rental housing in the past. RRH providers should be prepared to provide more assistance to households who may need a higher level of support to identify an eligible unit. This may include:
 - Assisting the household to look up eligible units online or via other local resources.
 - Assisting the household in calling landlords to inquire about available units.
 - Accompanying the household to view unit and meet with landlords.
 - Assisting the household in reviewing and understanding lease terms.

Financial Assistance

Financial assistance should be provided in adherence to a progressive engagement model, to provide the “lightest touch” intervention possible. Financial services typically include rental assistance, deposit assistance, and/or relocation assistance.

Eligible activities for financial assistance will depend on the project's funding source(s).

HP providers are required to provide the Access and Diversion phase of CE, using a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one-time payments and short-term housing assistance, to identify the lightest-touch method to successfully eliminate each participant's barriers to remaining in safe, stable permanent housing.

If diversion techniques are unsuccessful, HP projects are required to connect households to emergency services, including emergency shelter.

The amount of rental assistance provided is highly individualized, but should generally titrate down (i.e., lessen) the level of HP subsidies over time so that each household contributes more as they are able to and as stabilization is realized. Participants may receive approval for the minimum amount of rental assistance necessary to stabilize their housing crisis.

Participants will not be approved for more assistance than can be justified with their income and expenses at any given time. The actual level of assistance and duration offered varies depending on need and will be decided upon by the participant and the case manager. Generally, over time, (barring unforeseen circumstances) the project will pay less toward rent while the participant pays more, until such time as the participant, generally, is paying in full and exits the project. However, if income cannot increase substantially enough, the household cannot afford rent in full, and there is substantial reason to believe that the participant will obtain another form of permanent housing subsidy (i.e., HCV) the household may only be held accountable for a rent amount comparable to what they can expect to pay upon discharge from the HP project.

Since rental and/or financial assistance is to match the needs of the household, the duration of assistance will vary by household, lasting for no longer than the household needs to stabilize. That said, most households should be stabilized within an average 6-month timeframe. However, in some instances a subsidy may be needed for longer than 6 months, in which case an extension approval from the Project Manager should be obtained if the household still would qualify in terms of their income. Projects are to create their own internal extension approval process to be completed in writing at 6 and 9 months, if justified. Projects should create their own internal extension approval process for any households remaining in the project past 12 months, and should include regular internal extension reviews past 12 months (e.g., 15 months, 18 months, 21 months).

Reasonable extension justifications include serving:

- A participant with recent job loss
- Transition Aged Youth who need additional support to obtain housing stability
- A participant paying fines
- A participant recently incarcerated, hospitalized, etc.
- A participant waiting for a HCV, and there is reason to believe that it can be obtained before the maximum time allowed for HP.

In no instances will a household receive more than 24 months of prevention assistance in any 3-year period, and no fees can be imposed on project participants beyond payment of rent, utilities, or any other costs related to maintaining housing. Project participants may pay a share of costs related to their housing stability. If participants are participating in cost sharing, projects cannot pay any additional amounts outside of what is owed once the participant makes their payment.

For example, a participant's rent is \$1000 a month. The participant will be making a payment of \$600 towards their rent. The project is only allowed to pay the remaining \$400 balance that will be owed.

Keeping this general framework in mind, following are additional standards for projects and participants in HP related to duration and amounts of support:

- Rental or utility arrearages of up to 6 months may be paid if doing so will stop an eviction and prevent homelessness. The total arrearages may be more, in which case, additional funds can be used, or the landlord may opt to forgive that debt or create a repayment plan with the household.

- **Use with Other Subsidies.** Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.
- First month's rent after enrollment can be offered in full to assist the household. In the event the first month is prorated, the first full month may also be paid in full, if commensurate with the household's need, and, in the event the household relocated, security deposits cannot exceed 2 months of actual rent.
- Unit rent may not exceed either FMR or Rent Reasonableness.
- Additional costs may be covered to assist households enrolled in HP, but projects should refer to their actual grant application guidelines applicable to the contract year(s) they are funded for.

Prioritization

Prioritization	VLI or below	ELI or below	Likelihood to enter homelessness	Urgency of the Situation
1 st PRIORITY		X	X AND	X
2 nd PRIORITY		X	X OR	X
3 rd PRIORITY	X		X AND	X
4 th PRIORITY	X		X OR	X

Prevention will be targeted to those households who are very-low income and below, and meet other criteria demonstrating urgency and risk of becoming literally homeless.

Factors related to the likelihood that the household will enter an emergency shelter or an unsheltered situation

- If the household has previously experienced homelessness
- If the household has any prior evictions (formal actions taken by the landlord that resulted in loss of housing)
- Households fleeing DV
- The household is considered cost burdened and is spending more than 50% of their monthly budget on housing related costs like rent/mortgage

Factors related to the urgency of the situation

- Households with eviction proceedings underway
- Vulnerability to illness/death or has been diagnosed with a terminal illness
- Households with high levels of rent and utility arrears and large sums that need to be paid immediately in order to keep housing
- Household has an adult or minor child with a disability that requires caregiving or childcare, which is unattainable and impacts the head of household's ability to maintain employment
- Household has an individual with barrier that would present an issue in identifying new housing options, like a criminal history, arson, or sexual offender status.

When a household presents as a veteran, they will be prioritized as a potential for veteran housing opportunities like Supportive Services for Veteran Families (SSVF) and Veterans Affairs Supportive Housing (VASH). Veteran referrals identified will be referred to veteran providers prior to being offered CoC/ESG housing resources. If a veteran referral is not eligible for the resource due to program eligibility requirements, then the household will remain on the BNL for the next available resource.

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:

If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, "the provider must act as quickly as possible to move a participant, and affiliated individuals,

who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider's own inventory or through a transfer facilitated through the Keys to Home CoC's Coordinated Entry System." If a unit is not available within the provider's own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See Keys to Home Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking.

DIVERSION

Diversion is a type of intervention that is not always dependent on funding to be successful; sometimes some mediation is needed to get someone back into their housing. It is often a series of conversations and problem-solving strategies. Diversion serves to assist households in quickly resolving their housing crisis and avoiding prolonged homelessness so that community resources are prioritized for households most in need of intensive housing services.

Every attempt will be made to divert clients experiencing homelessness whenever possible to prevent a household's entry into a shelter by diverting them to other safe, appropriate housing options provided by the household's social support network and/or in the community. Diversion can be provided at the point of Coordinated Entry or pre-admission and/or duration of stay in the emergency shelter.

Eligibility Criteria

The following categories of individuals or families are eligible for diversion services:

- All households seeking homeless services assistance, but especially those requesting entry into limited emergency shelter beds
- All households identified during street outreach that have verifiable, alternative housing placements (temporary or permanently with family/friends, own place, etc.)
- All households identified in emergency shelter that have verifiable alternative housing placements (temporary or permanently with family/friends, own place, etc.)

Documentation

Relevant documentation standards include the information presented in the "Recordkeeping" section of the CoC's Written Standards. Additional documentation standards for this project type include:

- Documentation of verifiable, alternative housing placement (e.g. case note documenting date, the person spoken with, confirmation that participant can reside there) if paying for transportation services.
- Documentation of verifiable, stable income and the ability to afford housing costs beyond minimal move in assistance (e.g. deposits, first month rent) *no ongoing rental/utility assistance can be provided
- Documentation of Housing Status and income must be completed and **prior** to enrollment of a household into a Diversion project.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The lease must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
 - Signatures of both parties.

- HUD-91067 VAWA Lease Addendum (*Required for HUD CoC and ESG housing providers)
- Other documents required in all case files:
 - Passed Inspections (Minimum Habitability Standards and Lead-Based Paint, if applicable; e.g. the participant is leaving one unit and moving into another).
 - Rent Reasonableness and/or Fair Market Rent Documentation (*FOR CHALLENGE GRANT ONLY: Units are only required to meet rent reasonableness)
 - Case notes
 - Financial records related to any financial assistance provided to households
 - Any other documents as required by specific program regulations, subgrantee agreements, or the KTH CoC
- If rental arrearages are being paid, there must be proof of funds owed and that the landlord will cease eviction proceedings if paid.
- If utility arrearages are being paid, there must be proof of pending shut-off or that they are already shut-off, that the household is responsible for utilities per the lease, and that the bill is in the participant's name at the address on the lease.

Assessment

Households can be screened for diversion resources through CE or anytime during their housing crisis. A designated, trained staff member completes a diversion assessment. If the household is literally homeless, staff should also complete the coordinated entry assessment.

Services

Case managers approach all participants using progressive engagement to provide the “lightest touch” intervention possible. The goal of diversion is to prevent a household’s entry into literal homelessness by diverting them to other safe, appropriate housing options provided by the household’s social support network in the community. To this end, diversion services typically include conflict mediation, housing location/stabilization, and linkage to mainstream resources.

Relevant case management standards include the information presented in the “HOUSING FOCUSED CASE MANAGEMENT” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Income is reassessed at project exit for the purposes of housing stability. Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Some indicators of stability could be:
 - Goals cited in previously created goal plans will be realized.
 - The household will be paying rent in full (or to the level agreed upon as described above)
 - The housing crisis is resolved
 - The household feels as though they have enough support in place to maintain stabilization without funded essential services.
- Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy.
- Working with households to develop a Housing Stability Plan that includes review of the affordability of the household’s housing unit and the possibility of moving to a more affordable living situation.

Financial Assistance

While diversion does not always have a financial assistance component, the most effective diversion services provide access to a small pool of flexible funds that provide assistance for households to obtain/maintain housing (e.g., car repairs, childcare, grocery cards, bus tickets, etc.).

Financial assistance should be provided in adherence to a progressive engagement model, to provide the “lightest touch” intervention possible. Financial services typically include rental assistance, deposit assistance, and/or relocation assistance. Eligible activities for financial assistance will depend on the project’s funding source(s).

Diversion providers are required to provide the Access and Diversion phase of CE, using a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one- time payments and short-term housing assistance, to identify the lightest-touch method to successfully eliminate each participant’s barriers to remaining in safe, stable permanent housing.

If diversion techniques are unsuccessful, diversion projects are required to connect households to emergency services, including emergency shelter.

For Diversion Projects paying minimal move in costs (e.g. deposit, first month rent): Participants will not be approved for more assistance than can be justified with their income and expenses at any given time.

In no instances will a household receive more than 2 instances of diversion assistance in any 6-month period. After 2 unsuccessful diversion attempts, the household must be staffed during the next case conferencing meeting in order to determine if a diversion service will be provided.

Prioritization

Households are eligible for diversion at the point they are seeking homeless services. Typically, households scoring a 0 to 3 on the VI-SPDAT are potentially appropriate for diversion.

STREET OUTREACH (SO)

SO includes provision of essential services necessary to reach out to people experiencing unsheltered homelessness; connect them with ES, housing, or critical services; and provide urgent, non-facility- based care to those who are unwilling or unable to access ES, housing, or an appropriate health facility. Coordinated SO that identifies and engages people living in unsheltered locations, such as in cars, parks, abandoned buildings, encampments, and on the streets, plays critical roles within systems for ending homelessness. Effective SO reaches people who might not otherwise seek assistance or come to the attention of the homelessness service system and ensures that people’s basic needs are met while supporting them along pathways toward housing stability.

Engagement should take place outdoors or apart from a homeless services building. SO staff should perform engagement activities both within and outside of traditional business hours.

Eligibility Criteria

The following categories of Individuals or families are eligible for SO services:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1
AND
- Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in ES

Note: It makes no difference if the individual experiencing homelessness is in a rural, suburban, or urban area. If the individual meets the above criteria, they are eligible, regardless of their location. Also, ES is not required as an interim step to access SO.

There are no additional criteria or guidelines that homeless households must meet to access these services.

Documentation

Relevant documentation standards include the information presented in the “RECORDKEEPING” section of the CoC’s Written

Standards. Additional documentation standards for this project type include:

- Staff should be working with participants to obtain their necessary documentation, if applicable (i.e., Social Security cards, birth certificates, chronic status verification, etc.). These efforts would be documented in the case files along with any additional case notes.

Assessment

Outreach workers are able to enroll households across the community, outside office walls, engaging with participants early and often. SO projects are required to provide the access, diversion, assessment, prioritization, and referral phases of CE, as described in the CE Policies and Procedures. SO projects are required to provide the Prevention phase of CE only to the extent necessary to determine that a participant is not experiencing literal homelessness and refer them to an appropriate service provider.

If SO projects are funded to provide the Prevention and Rapid Exit phases of CE, they must use a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one-time payments and short-term housing assistance, to identify the lightest-touch method to successfully re-establish each households into safe, stable permanent housing.

To the extent possible, SO staff should complete the coordinated entry assessments (e.g., VI-SDPAT and Place Value Assessment) with all participants. SO staff must also work to determine a household's eligibility for services at local homeless assistance projects.

Services

Street outreach services should be targeted and coordinated as follows:

Standard 1: Street outreach efforts are coordinated and targeted with the broader network of programs, services, or staff who are likely to encounter individuals experiencing unsheltered homelessness, but whose regular focus is broader than homelessness including the following involved entities:

1. Law enforcement and first responders
2. Hospitals
3. Health and behavioral healthcare providers
4. Child welfare agencies
5. Homeless education liaisons
6. Workforce systems
7. Faith-based organizations
8. Other community-based providers

Standard 2: Street outreach is critical for connecting unsheltered households to housing and services. Street outreach projects must be entry points for unsheltered households in the coordinated entry (CE) process. Each street outreach agency staff member must complete assessor training with the KTH CoC staff and serve as an assessor for Coordinated Entry. These staff members can then identify and engage with unsheltered households who agree and are eligible to participate in the local CE process. Due to the nature of street outreach, it is understandable if it takes several engagements to proceed with the CE process. Street Outreach staff serving as assessors have access in HMIS to complete the CE enrollment with unsheltered households, record referrals to housing and supportive services, and place households on the priority list.

Standard 3: Street outreach efforts are housing-focused. Street outreach programs must not require individuals to enter an emergency shelter or transitional housing as an 'interim step' or prerequisite to accessing stable housing. However, street outreach does make immediate connections to an emergency shelter or temporary housing to provide safe options while individuals and families are on a pathway toward stability.

There should be repeated attempts to assist, respecting participant choice.

Funded SO Projects should conduct SO at a minimum of weekly, depending on budget and staffing.

No one is terminated from this project type unless: 1) They are placed in housing of their choice, 2) They indicate that they no longer need our services and request that their case be closed, or 3) They pose a serious threat of harm to the outreach staff or other participants.

Additional minimum standards for this project type include:

- SO efforts are housing focused; emphasize safety and reduce harm; and are systematic, coordinated, and comprehensive
- Funded outreach staff/teams must participate in and/or lead the unsheltered PIT count in their community.

Relevant case management standards include the information presented in the HOUSING FOCUSED CASE MANAGEMENT” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Outreach staff should establish trust with the individuals or families identified through outreach focusing on building positive relationships, including creating a safe presence and initiating non-threatening conversation.
- Engagement activities should include an initial assessment of needs and eligibility in order to prioritize the type and source of assistance required, prioritizing safety and urgent health needs.
- Outreach staff should conduct an assessment to identify and prioritize those services for which individuals/families identified through outreach are eligible, including: case management; food sources; transportation; employment; early learning and education services; emergency health services; emergency mental health services; and essential services tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are living unsheltered.
- To the greatest extent possible, outreach staff completes the CE Assessment “out in the field”, enroll participants in the outreach Project for as long as needed (if that is the individual's choice), and hand off eligible households to longer term assistance Projects (such as permanent housing, RRH, or another appropriate permanent housing option).
- Outreach staff should link unsheltered individuals to a place to get warm, address/provide basic survival items and aid with accessing services and housing.
- Services should include linking participants to services and resource, including behavioral health and intellectual disability services.
- Services should be targeted to assisting households with attaining housing stability as quickly as possible.
- Participants should be linked to additional services by way of a warm hand off to the greatest extent possible.

Prioritization

Anyone who is unsheltered is prioritized for SO, although everyone who meets eligibility should be able to be enrolled.

TEMPORARY HOUSING

Temporary Housing refers to a time-limited housing project where households experiencing homelessness may stay and receive shelter and supportive services that are designed to enable individuals to move into permanent housing. Temporary Housing may be site-based or scattered-site. There are four types of Temporary Housing recognized by the KTH CoC at this time: Emergency Shelter (ES), Inclement Weather Emergency Shelter (IWES), Bridge Housing (BH), and Transitional Housing (TH, including HUD-funded joint TH/RRH projects).

Emergency Shelter (ES) is a temporary shelter designed to assist with an individual’s or family’s immediate housing crisis. ES may be site-based, e.g., a standard shelter building, or scattered-site, e.g., hotel vouchers or master-leased apartment units. Households should not be denied access to ES due to lack of identification/proof of residency, unless required to produce

this documentation by a supplemental funding source.

Inclement Weather Emergency Shelter (IWES) is a temporary shelter designed to assist with an individual's or family's immediate housing crisis, typically during inclement weather, e.g., extreme cold, extreme heat, or a severe weather event. Because IWES is typically only available during severe weather events, on a night by night basis, the location/type of shelter may not be consistent each time it is made available.

Bridge Housing (BH) refers to time-limited temporary housing where households experiencing homelessness may stay and receive supportive services needed to attain and move into permanent housing. This housing type is typically reserved for veteran households awaiting permanent housing opportunities like HUD-VASH vouchers.

Transitional Housing (TH) refers to a time-limited temporary housing project where households experiencing homelessness may stay and receive supportive services that are designed to enable individuals to move into permanent housing.

The KTH CoC embraces the housing-first approach, where households are offered permanent housing before any other type of assistance. The KTH CoC understands that temporary housing is a key component to the local housing crisis response system and provides a valuable option for households seeking an interim solution to a housing crisis while seeking permanent housing, especially for households belonging to certain target populations such as youth, people in recovery from substance use, and people fleeing domestic violence.

Eligibility Criteria

Any household with no other feasible alternative for permanent housing is eligible for temporary housing. Diversion should be attempted with all potential participant households before enrollment into temporary housing.

The following categories of individuals or families are eligible for HUD-funded TH services:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence AND
- Households must either present with multiple barriers to obtaining and retaining housing or have one primary barrier other than financial (people whose primary barrier to housing stability is economic in nature do not require TH).

HUD-funded projects should refer to NOFO for the year they were funded since the above categories are subject to change.

Non-HUD funded TH Projects may serve Categories 1, 2, 3, and 4 or per their established eligibility requirements.

Documentation

Relevant documentation standards include the information presented in the "RECORDKEEPING" section of the CoC's Written Standards. Additional documentation standards for this project type include:

- Executed Occupancy Agreement and any extensions, if applicable

The following categories of individuals or families are eligible for Joint TH/RRH services:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence
- Those residing in a TH project that is being eliminated
- Those residing in TH being funded by another Joint Component project

Documentation

Relevant documentation standards include the information presented in the "RRH," "TH," and "RECORDKEEPING" sections of the CoC's Written Standards.

The following categories of individuals or families are eligible for ES services:

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 4: Fleeing/Attempting to Flee Domestic Violence

Documentation

Relevant documentation standards include the information presented in the “RECORDKEEPING” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Completing the **Homeless Certification** to be used when coordinating with a permanent housing provider.
- Working with participants to obtain their necessary documentation, if applicable (i.e., Social Security cards, birth certificates, chronic status verification, etc.). These efforts would be documented in the case files along with any additional case notes.

To the maximum extent possible, shelters should avoid discharging guests except when the guest poses a danger to themselves or other shelter residents; discharging guests should be a last resort when there are no other viable options available. ES *may* deny entry or future stays only for the reasons listed below. In these situations, alternative shelter must be identified.

- Violence towards other guests or staff
- Excessive damage to property
- Theft from the shelter or other guests
- Need for medical services beyond those the shelter is equipped to provide
- For an individual in shelter who has a Protection From Abuse order, the abuser named in this order may be denied entry to the shelter. Any known abuser of a current resident will not be allowed access to the site, even if there is not an active Protection from Abuse order.
- Sex offender registered on Megan’s Law list, if the shelter provides services to families/children or if the location of the shelter will not allow the participant to reside there (e.g., proximity to school).

Assessment

All households access HUD-funded TH Projects via CE and should be offered the option with as few barriers to project entry as possible.

All households access HUD-funded Joint TH/RRH Projects via CE. Projects must offer both components: participants are able to choose what housing setting makes the most sense, which may include TH Only, RRH only, or TH and RRH. The choice should be driven by participant choice and needs.

ES may accept participant referrals from CE, other agencies, or from the participants themselves (i.e., self-referral/participant reaches out for services). ES projects are required to provide the Access, Diversion, Assessment, Prioritization, and Referral phases of CE, as described in the CE Policies and Procedures. ES projects are required to provide the Prevention phase of CE only to the extent necessary to determine that a participant is not experiencing literal homelessness and refer them to an appropriate service provider. If funded to do so, ES projects must also provide the Prevention and Rapid Exit phases of CE.

During the Access and Diversion phase of CE, shelter intake staff should explore all options prior to enrolling a household in ES, including problem-solving conversations, identifying community supports, and offering lighter touch solutions. If ES projects are funded to provide the Prevention and Rapid Exit phases of CE, they must use a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one-time payments and short-term housing assistance, to identify the lightest-touch method to successfully eliminate each participant’s barriers to remaining in safe, stable permanent housing.

Victims of Domestic Violence, dating violence, sexual assault, and stalking: To the extent possible, these households will be referred to the local domestic violence agency for safe shelter. When not feasible, shelter providers will work with their local

domestic violence agency to develop protocols to meet their safety needs.

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:

If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Keys to Home CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See Keys to Home Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking.

Services

Services should be in line with the housing first standards. Participation in services must be voluntary, housing-focused, and participant-centered. Staff should develop housing stabilization plans with participants. Staff should also provide linkages to mainstream resources and services.

While TH may be used to cover the costs for up to twenty-four months of housing with accompanying supportive services, it is intended to be used as bridge housing (i.e., temporary housing when shelter is unavailable or the participant is preparing to enroll in permanent housing), not exceeding twelve months, except in extenuating circumstances, with an average target of a six-month stay per household. Ideally, stays will not exceed 90 days, lasting for only as long as it takes for a household to secure permanent housing. The actual length of stay for a particular household will vary based on their specific needs and the availability of affordable permanent housing resources.

Longer-term TH, in excess of six months or twelve months, should be targeted to people who face more severe challenges to finding housing.

For CoC-funded projects, to determine rent/occupancy charges, if rental assistance is being applied (as opposed to leasing dollars), the rent contribution or the maximum occupancy charge is the highest of the following amounts (rounded to the nearest dollar):

- 30% of the family’s monthly adjusted income (as outlined at Part 5.609 and 5.611(a));
- 10% of the family’s monthly gross income; or
- If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family’s actual housing costs) is specifically designated by the agency to meet the family’s housing costs, the portion of the payments that is designated for housing costs.

Please keep in mind that for TH projects in which rental assistance is provided, the rent contribution is not optional and must equal the rent contribution specified above. For projects that provide TH using funds other than rental assistance funds, the occupancy charge is optional and can be lower, but not higher, than the maximum occupancy charge specified above.

For Joint TH/RRH: The maximum duration of support for both components combined is 24 months per household.

The CoC has not established a maximum length of stay in ES. However, the goal is for households to remain in shelter for the shortest time possible to stabilize housing. Shelters should provide flexibility related to length of stay based on individual needs, recognizing factors that may necessitate a longer length of stay such as awaiting housing through the CoC’s CE process. Shelters should maintain a housing-focused approach when working with participants.

ES should not charge fees to participants.

Relevant case management standards include the information presented in the “HOUSING FOCUSED CASE MANAGEMENT” section of the CoC’s Written Standards. Additional case management standards for the TH project (including joint TH/RRH) type include:

- Exit planning should start upon Project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy
- Case Managers offer to meet with participants at least bi-weekly (this stipulation supersedes any language requiring case managers to offer meeting only monthly).
- For projects with operating or leasing dollars where occupancy agreements or sub-leases are used, the role of the case manager and the role of landlord should be separate and distinct to ensure the case manager can engage with the participant to build trust and rapport instead of focusing on holding the participant accountable to their lease.

Additional minimum standards for this project type include:

- The project will provide enough RRH assistance to ensure that at any given time a project participant may move from TH to permanent housing (rule of thumb: there should be twice as many RRH than TH at any point in time, but variations can be found if appropriate for the population served).

HMIS/reporting requirements:

- TH/RRH projects must be set-up in HMIS data system as two-different Projects: one TH project and one RRH project CoC-funded TH/RRH must submit one APR for TH and one APR for RRH.

Relevant case management standards include the information presented in the “HOUSING FOCUSED CASE MANAGEMENT” section of the CoC’s Written Standards. Additional case management standards for the ES project type include:

- Exit planning should start upon project entry with regular discussions about moving towards permanent housing.
- Shelter staff should conduct an initial service assessment within 14 days of intake, prioritizing emergency service needs and referral to CE; the access, assessment, and diversion phases of CE; then coordinating/providing services most crucial to housing attainment. Reassessments should be conducted weekly until discharge.

Additional minimum standards for this project type are:

- Engaging participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement back into permanent housing.
- Discharging, to the greatest extent possible, to a permanent housing resource.
- Making it known that use of the facilities and services are available to all on a nondiscriminatory basis.
- To the extent possible, ES should have 24/7 hours of operation.

- There must be access to staff, whether paid or volunteer during hours of project operation. This may be on site or through cell phone, if necessary.
- Shelters should provide access to food preparation and food storage space.
- Shelters should make an effort to establish secure space for storage of personal possessions.
- To the maximum extent possible, shelters should provide secure storage of medications, especially in shelters with children.
- Smoking is prohibited in buildings that provide shelter to children.
- Weapons may not be brought into ES.
- Shelter guests may not bring or use illegal substances or alcohol on the premises.

Prioritization

TH should be targeted to people who face more severe challenges to finding housing. Projects should target and prioritize people experiencing homelessness with higher needs (i.e., multiple barriers to obtaining and retaining housing and/or those who are most vulnerable). A more lenient prioritization may be used if the Joint TH/RRH project exists to fill an emergency placement gap (i.e., the household would remain unsheltered if not for enrollment into the project). TH- RRH projects should follow the Order of Prioritization for TH and RRH projects, depending on which project component participant will be entering.

For ES: Each shelter will be responsible for establishing their own prioritization standards, including serving on a first-come, first-served basis.

PERMANENT HOUSING

Permanent Housing refers to housing that is safe and stable where the household has a lease or sub-lease in their name lasting a term of at least one year. A rental subsidy and voluntary services may be provided to help the participant household retain housing and remain stable.

Rapid Rehousing

RRH Eligibility Criteria

The following categories of individuals or families are eligible for RRH:

- Category 1: Literally Homeless
 - Category 4: Fleeing/Attempting to Flee Domestic Violence
 - Homeless as defined at 24 CFR 576.2 (Definition 1 and 4) (**HUD CoC RRH IS NOT ALLOWED TO USE THIS DEFINITION**)
- AND
- Must be unable to access housing without assistance
 - The program participant must meet the eligibility requirements set forth in the NOFA under which the project was funded (HUD CoC RRH only)
 - Programs may not establish additional eligibility requirements beyond those specified here and those required by funders
 - All referrals to RRH must come through CE (Approved Rapid Exit projects may be eligible to skip this requirement)

There are no income eligibility requirements for households at the time of initial eligibility/enrollment.

Regarding Chronic Status: Participants who were chronically homeless prior to RRH entry maintain their chronically homeless status while they are receiving RRH.

Participant Transfers (non Emergency Transfer Requests) Transferring participants from RRH project to RRH project should only happen in rare and limited instances (e.g. one project has run out of funds, and household needs continued services). Subgrantees should budget accordingly to ensure that enrolled participants can be served for the duration of the grant period, if needed. Additionally, participants should be fully assessed at entry to ensure the proper placement in an RRH project (e.g. if the assessment shows the household may need medium-term assistance, the subgrantee should not enroll the household in a project that only offers one-time assistance). See CoC HMIS Policies and Procedures for additional guidance about transferring participants in HMIS.

In the instance a household has to transfer projects, subgrantees must complete eligibility screening and any required documentation for the new project the household is being admitted into.

Reevaluation: CoC and Challenge recipients and subrecipients must conduct regular re-evaluations, **at least annually**, of program participants receiving RRH assistance. To continue to receive CoC or Challenge RRH assistance, a program participant's reevaluation must demonstrate eligibility based on:

- Lack of resources and support networks. The program participant's household must continue to lack sufficient resources and support networks to retain housing without CoC program assistance.
- Need. The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing.

In addition, a RRH re-evaluation must demonstrate:

- Income. The program participant household's annual income must be less than or equal to 30 percent of Area Median Income (AMI).
- **FOR CHALLENGE GRANT ONLY:**
 - Gross annual income must be less than 80% of area median income based on the income limits most recently published by HUD.

*The CoC Program interim rule does not establish an income eligibility guideline for continued RRH assistance. However, as part of its written standards, a Continuum of Care may establish an income requirement for continued eligibility in order to align—to the extent possible—its RRH assistance with ESG assistance provided within the CoC's geographic area.

All reevaluations must be documented in the HMIS database according to CoC HMIS Policies and Procedures. See CoC HMIS Policies and Procedures for additional guidance.

Documentation

Relevant documentation standards include the information presented in the "RECORDKEEPING" section of the CoC's Written Standards. Additional documentation standards for this project type include:

- Documentation of Housing Status must be completed and **prior** to enrollment of a household into a RRH project.
- Projects must offer a standard, basic level of support to all landlords who lease to project participants as detailed in a written agreement that should be signed by the Case Manager or Housing Locator and the landlord. At a minimum, this agreement should specify that the Case Manager and/or Housing Locator will:
 - Inform the landlord about the amount and duration of financial assistance being provided to the participant;

- Respond quickly (ideally within one business day) to landlord calls about serious tenancy problems;
 - Seek to resolve conflicts around lease requirements, complaints by other tenants, and timely rent payments; and,
 - If necessary, help negotiate move-out terms and assist the participant to quickly locate and move into another unit without an eviction.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The lease must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
 - Signatures of both parties.
 - HUD-91067 VAWA Lease Addendum (*Required for HUD CoC and ESG housing providers)

Other documents required in all case files:

- Passed Inspections (Minimum Habitability Standards and Lead-Based Paint).
- Rent Reasonableness and/or Fair Market Rent Documentation (*FOR CHALLENGE GRANT ONLY: Units are only required to meet rent reasonableness)
- Case notes
- Financial records related to any financial assistance provided to households
- Any other documents as required by specific program regulations, subgrantee agreements, or the KTH CoC
- Housing Plans are required. HP Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.

Assessment

Households will be screened for RRH resources through CE. Access points will complete RRH prioritization assessments that evaluate household needs, financial needs, and risk of homelessness.

Participants fleeing DV/attempting to flee DV may be eligible for EITHER HP OR RRH resources, per HUD eligibility guidance (*see note under "Eligibility" section for more information). A Victim Service Provider (VSP) may make referrals based on participant choice and resource availability. If referral to prevention resources is appropriate, VSP may make referral to HP resources (including VSP specific resources).

RRH Services

RRH consists of three main components: 1) Housing Navigation, 2) Financial Assistance, and 3) Support Services.

1. Housing Navigation

RRH providers take responsibility for locating housing options for participant households, considering the household's needs and preferences. Specifically, the RRH provider should:

- Recruit landlords to provide housing opportunities for eligible households
- Address potential barriers to landlord participant such as concern about the short-term nature of rental assistance and/or tenant qualifications
- Assist households to find and secure appropriate rental housing

2. Financial Assistance

Utilizing a progressive engagement approach, RRH projects provide financial assistance to cover move-in costs, deposits, and the rental and/or utility assistance necessary to allow households to move immediately out of homelessness and to stabilize in permanent housing.

3. Housing-Focused Case Management and Services

While household participation in case management and services is voluntary, case managers must show due diligence efforts to meet with participant households at least once per month and should assertively engage participants whenever possible. Case management should be focused on obtaining and retaining housing.

Relevant minimum standards include the information presented in the "HOUSING FOCUSED CASE MANAGEMENT" section of the CoC's Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy.
- Case management meetings are required monthly, although additional meetings can always be offered by the case manager as needed and/or scheduled as requested by the participant. Meetings should be in the participant's home or in a mutually agreed-upon community setting, as opposed to an office setting, to the greatest extent possible.
- Shared Housing arrangements are allowable in RRH, and providers are encouraged to explore and support these arrangements if this would support the long-term housing stability of project participants. Shared Housing arrangements may be particularly helpful in areas with high cost of living where renting an SRO or 1BR apartment may not be financially viable long term for individual participants.
 - Shared housing is broadly defined as a living situation where two or more individual or family units share a single housing unit. This includes sharing housing costs like rent and utilities. Each individual or family unit has their own personal space, but there are common spaces that are shared such as bathrooms, kitchen and living room. Housing units can be any unit with multiple bedrooms. It can be an apartment or an entire building. The homeowner can live on the premises or not, but if the homeowner is related to the tenants, CoC and ESG dollars cannot pay rent.
 - A one-bedroom unit cannot be used for shared housing. Shared housing is not the same as doubled up. Each individual or family unit has their own space, holds their own lease and resides in housing that is permanent.
 - In a shared housing arrangement, each individual or family unit must hold their own lease.
 - 4 keys to implementing a successful shared housing model: 1) Identifying households who may be interested in shared housing; 2) Developing a process that matches appropriate people together,

driven by client choice; 3) Engaging landlords who are amenable to split lease scenarios and streamlining the process as much as possible for landlords; 4) Clarifying expectations around how the shared housing arrangement will work. Shared housing agreements can help clarify expectations. These agreements can cover anything from house rules, visitor expectations, sharing of bills (food, utilities, etc.), and more.

Additional minimum standards for this project type include:

- Households should be enrolled into rapid re-housing once it is mutually agreed upon (by the participant and the provider) that the two parties will be working toward permanent housing together. Providers should not wait until permanent housing is found to enroll the household.
- Exit planning should start upon Project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy or with a permanent subsidy resource such as Public Housing, Housing Choice Vouchers, affordable housing developments, etc.
- Income is reassessed at least quarterly for the purposes of adjusting rental payments. Although these income assessments should be accounted for in HMIS, they generally will not have a bearing on eligibility (apart from the Annual Assessment, at which time the household must fall within eligible income limits to be minimally eligible for continued RRH assistance). Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Conversely, if the household has not reached stabilization yet, they may still obtain RRH assistance, regardless of their actual income at non-Annual, quarterly Assessments. Some indicators of stability could be:
 - Goals cited in previously created goal plans will be realized
 - The household will be paying rent in full (or to the level agreed upon as described above)
 - The housing crisis is resolved
 - The household feels as though they have enough supports in place to maintain stabilization without ESG's essential services
- Provide housing locator services. While the amount of assistance related to housing search varies by provider, at a minimum this should include:
 - Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
 - Provide education and outreach to landlords to address potential barriers to their participation
 - Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
 - Help individuals and families negotiate manageable and appropriate lease agreements with landlords

- In general, some households may need more intensive assistance with housing search than others, due to barriers to tenancy (such as criminal record) or lack of experience with rental housing in the past. RRH providers should be prepared to provide more
- Projects should follow HUD guidance on calculating rent contributions in shared housing.

RRH Rental Assistance

The KTH CoC has not set a maximum dollar amount that a program participant may receive for each type of financial or rental assistance. The KTH CoC has not set a maximum period for which a program participant may receive any type of RRH assistance, except for those maximum periods established by 24 CFR 578. The total amount of RRH rental assistance a household may receive is up to 24 months in one occurrence. Each case requesting assistance should be assessed monthly to determine if assistance will continue, assistance should not be guaranteed for a maximum period of time, even though the funding source may allow for up to 24 months.

Supportive Services	No longer than 6 months after the rental assistance stops
Short-term and medium-term rental assistance	Up to 24 months

KTH CoC does not have a minimum amount or percentage that program participants must pay while receiving Rapid Rehousing (however, participants may participate in cost sharing).

Financial assistance should be provided in adherence to a progressive engagement model, to provide the “lightest touch” intervention possible. Financial services typically include rental assistance, deposit assistance, and/or relocation assistance. Eligible activities for financial assistance will depend on the project’s funding source(s).

The amount of rental assistance provided is highly individualized, but should generally titrate down (i.e., lessen) the level of RRH subsidies over time so that each household contributes more as they are able to and as stabilization is realized. Participants may receive approval for the minimum amount of rental assistance necessary to prevent a return to homelessness.

Participants will not be approved for more rental assistance than can be justified with their income and expenses at any given time. The actual level of assistance and duration offered varies depending on need and will be decided upon by the participant and the Case Manager. Generally, over time, (barring unforeseen circumstances) the project will pay less toward rent while the participant pays more, until such time as the participant, is paying in full and exits the project. However, if income cannot increase substantially enough, the household cannot afford rent in full, and there is substantial reason to believe that the participant will obtain another form of permanent housing subsidy (i.e., HCV, PSH, etc.) the household may only be held accountable for a rent amount comparable to what they can expect to pay upon discharge from the RRH project.

Since rental and/or financial assistance is to match the needs of the household, the duration of assistance will vary by household, lasting for no longer than the household needs to stabilize. That said, most households should be stabilized within an average timeframe of 12 months or less. -Some extenuating circumstances may necessitate extending RRH assistance past 12 months. Reasonable extension justifications could include:

- A participant with recent job loss

- Transition Aged Youth
- A participant paying fines
- A participant recently incarcerated, hospitalized, etc.
- A participant waiting for a PSH unit, HCV, etc. and there is reason to believe that it can be obtained before the maximum time allowed for RRH.

Projects should create their own internal extension approval process for any households remaining in the project past 12 months, and should include regular internal extension reviews past 12 months (e.g., 15 months, 18 months, 21 months). If average length of stay within an RRH project exceeds 12 months, the CoC may engage the provider to offer technical assistance.

In no instances will a household receive more than 24 months of RRH assistance in any 3-year period, and no fees can be imposed on project participants beyond payment of rent, utilities, or any other costs related to maintaining housing. Project participants may pay a share of costs related to their housing stability. If participants are participating in cost sharing, projects cannot pay any additional amounts outside of what is owed once the participant makes their payment.

For example, a participant's rent is \$1000 a month. The participant will be making a payment of \$600 towards their rent. The project is only allowed to pay the remaining \$400 balance that is/will be owed.

Keeping this general framework in mind, following are additional standards for projects and participants in RRH:

- First month's rent can be offered in full to assist the household. In the event the first month is prorated, the first full month may also be paid in full, if commensurate with the household's need, and security deposits cannot exceed 2 months of actual rent.
- If, under the terms of the lease, the participant is responsible for paying their own utilities, grantees must follow the requirements for utility payments and reimbursement per Notice: CPD-17-11⁶⁷:
 - CoC interim rule explicitly requires RRH projects to calculate rent as the sum of the total monthly rent for the unit and, if the participant pays separately for utilities, the monthly allowance for utilities established by the public housing authority (PHA) for the area in which the housing is located.
 - For the purposes of determining the reasonable monthly utility consumption, Projects must use the local PHA's schedule of utility allowances, which are based on unit size and the utilities the project participant is expected to pay. Grantees should contact their PHA to obtain the schedule of utility allowances and exception utility allowances.
- For CoC-funded Projects, unit rent may exceed FMR, but it may not exceed Rent Reasonableness. This means that a recipient or subrecipient is allowed to pay rents up to the rent reasonable amount even if this is higher than the FMR. If rent reasonableness rates are lower than FMR, the maximum allowable contract rent amount is still capped at rent reasonableness rates.
- Additional costs may be covered to assist households enrolled in RRH, but projects should refer to their actual grant application and NOFO/Project guidelines applicable to the contract year(s) they are funded for.
- In some cases (approved by CoC Governing Board and/or CoC Funding Committee), CoC RRH funds can be used for Rapid Exits. Through Rapid Exits, RRH funds can be used from day 1 of a household's contact with Coordinated Entry during the Diversion and Rapid Exit Phases of CE for one-time financial assistance (such

as first/last/security deposit/utility deposit) and light-touch case management focused on housing search and ensuring a household is connected to the mainstream benefits and resources they qualify for (Medicare, Medicaid, SSI, Food Stamps/ SNAP, local Workforce office, early childhood education, TANF, substance use disorder programs, employment assistance programs).

- Rapid Exit funds are prioritized for households with a source of income who need minimal financial assistance to exit homelessness, and who have identified a unit or are in the process of identifying a unit, and do not require ongoing supportive services/ case management. Rapid Exit funds may be used to assist households with housing search.
- Households identified for Rapid Exits are not required to go through the full CE prioritization, case conferencing, and referral process. Household must still be screened and meet RRH eligibility guidelines in addition to the criteria listed in the above bullet point.

RRH Eligible Costs

The following list is from [24 CFR Part 578](#). Definitions for each cost can be found at the regulation. (For HUD-funded RRH only)

- Rental Assistance
 - Short-term rental assistance (up to 3 months)
 - Medium-term rental assistance (4 to 24 months)
- Financial Assistance
 - Security deposits
 - First and last month's rent
 - Property damage
- Support Services
 - Case management, childcare, education services, employment assistance and job training, food, housing search and counseling services, legal services, life skills training, mental health services, moving costs, outpatient health services, outreach services, substance abuse treatment services, transportation, utility deposits
- HMIS
- Project Administration

RRH Prioritization

The prioritization for households determined to be eligible for RRH will be consistent with the CoC's scoring range for need and vulnerability associated with RRH projects. Additionally, the CoC has opted to prioritize the following households for RRH:

- Literally Homeless Individuals
- Households who are unsheltered, or residing in non-congregate shelter, will be a priority for housing.

The following factors will apply as tie-breakers when necessary.

1. Length of Time Homeless
2. VI-SPDAT score
3. Presence of other priority factors (See "PRIORITIZATION" section of CoC Written Standards)

If no unsheltered individuals can be identified, literally homeless individuals residing in shelters or transitional housing will be prioritized using the same criteria.

Literally Homeless Families and Youth

Families and youth who are sheltered or unsheltered, including non-congregate shelter, will be a

priority for housing. The following factors will apply as tie-breakers when necessary.

1. Length of Time Homeless
2. VI-SPDAT score
3. Presence of other priority factors (See "PRIORITIZATION" section of CoC Written Standards)

When a household presents as a veteran, they will be prioritized as a potential for veteran housing opportunities like Supportive Services for Veteran Families (SSVF) and Veterans Affairs Supportive Housing (VASH). Veteran referrals identified will be referred to veteran providers prior to being offered CoC/ESG housing resources. If a veteran referral is not eligible for the resource due to program eligibility requirements, then the household will remain on the BNL for the next available resource.

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:

If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, "the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider's own inventory or through a transfer facilitated through the Keys to Home CoC's Coordinated Entry System." If a unit is not available within the provider's own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See Keys to Home Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking.

Permanent Supportive Housing

PSH Eligibility Criteria

The following categories of individuals or families are eligible for PSH services:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence

AND

- At least one member of the household must have a disability
- The program participant must meet the eligibility requirements set forth in the NOFA under which the project was funded
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders
- All referrals to PSH must come through CE (Approved Rapid Exit projects may be eligible to skip this requirement)

There are no income eligibility requirements for households at the time of initial eligibility/enrollment. However:

- Recipients or subrecipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified. If there is a change in family composition (*e.g.*, birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination (outside of the annual reexamination), and the occupancy charge will be adjusted accordingly.
- As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants

must provide the recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment.

Regarding Project Transfers into PSH: In accordance with CE policy/procedure for transitioning households from RRH to PSH, households in RRH who are both eligible for PSH and in need of non- time limited supportive housing will be eligible to transfer from RRH to PSH, provided the household meets the criteria of chronic homelessness.

Regarding Chronic Status: Participants who were chronically homeless prior to RRH entry maintain their chronically homeless status while they are receiving RRH. RRH participants may also “time into” chronic homelessness, provided their time in RRH meets the required length of time homeless under the chronic homeless definition.

Participant Transfers (non Emergency Transfer Requests) Transferring participants from PSH project to PSH project should only happen in rare and limited instances (e.g. one project has run out of funds, and household needs continued services). Subgrantees should budget accordingly to ensure that enrolled participants can be served for the duration of the grant period, if needed. See CoC HMIS Policies and Procedures for additional guidance about transferring participants in HMIS.

In the instance a household has to transfer projects, subgrantees must complete eligibility screening and any required documentation for the new project the household is being admitted into.

Reevaluation: CoC PSH recipients and subrecipients must conduct regular re-evaluations, **at least annually**, of program participants receiving PSH assistance.

- Recipients or subrecipients must examine a program participant's income initially, and **at least annually** thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified. If there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination (outside of the annual reexamination), and the occupancy charge will be adjusted accordingly.
- As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants must provide the recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment.
- The services and assistance provided to that program participant, including evidence that the recipient or subrecipient has conducted an annual assessment of services for those program participants that remain in the program for more than a year and adjusted the service package accordingly, and including case management services as provided in [§ 578.37\(a\)\(1\)\(ii\)\(F\)](#).

All reevaluations must be documented in the HMIS database according to CoC HMIS Policies and Procedures. See CoC HMIS Policies and Procedures for additional guidance.

Documentation

Relevant documentation standards include the information presented in the “RECORDKEEPING” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Each potential Project participant must have **Documentation of Disability**
- Each potential Project participant must have **Documentation of Chronic Homelessness** CoC-funded PSH projects must also follow the recordkeeping recommendations of HUD CPD Notice 16-11 regarding:

Evidence of Severe Service Needs; Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance; and Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.

- PSH projects should follow the detailed guidance on recordkeeping related to documenting chronic homelessness can be found in the HUD CoC Virtual Binder.
- In most cases, PSH providers should obtain documentation of disability and chronic status prior to enrollment. However, please note that in some cases CoC-funded PSH projects may enroll a household without documentation if, based on the household's intake screening, the project believes the household to be eligible but lacks the necessary paperwork at enrollment; AND the project can obtain the necessary documentation within 45 days of project enrollment. PSH providers should ensure that eligibility documentation is completed prior to move in.
- If self-certification of chronic homelessness is received, HUD recommends that the recipient continue to try to obtain third-party documentation within 180 days of the participant's enrollment in the project. However, breaks in homelessness can be documented by self- certification.
- An executed occupancy agreement or lease must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease or occupancy agreement start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
 - Signatures of both parties.
 - HUD-91067 VAWA Lease Addendum

Other documents required in all case files:

- Passed Inspections (Minimum Habitability Standards and Lead-Based Paint).
- Rent Reasonableness and/or Fair Market Rent Documentation
- Case notes
- Financial records related to any financial assistance provided to households
- Any other documents as required by specific program regulations, subgrantee agreements, or the KTH CoC
- Housing Plans are required. HP Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.

Assessment

Households will be screened for PSH resources through CE. Access points will complete PSH prioritization assessments that evaluate household needs, financial needs, and risk of homelessness.

Participants fleeing DV/attempting to flee DV may be eligible for EITHER HP OR RRH resources, per HUD eligibility guidance (*see note under "Eligibility" section for more information). A Victim Service Provider (VSP) may make referrals based on participant choice and resource availability. If referral to prevention resources is appropriate, VSP may make referral to HP resources (including VSP specific resources).

PSH Services

PSH programs should adhere to the best practice standards. To the greatest extent possible, households should be assisted to access community-based and workforce readiness services. It is expected that households participating in PSH will need a high level of case management. Programs must ensure households have access to the necessary supports in order to maintain housing stability. Participation in these services is required as a condition of remaining in the PSH unit or project.

Relevant minimum standards include the information presented in the “HOUSING FOCUSED CASE MANAGEMENT” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Support services must be made available to Project participants, and participation in supportive services is required for all participants.
- Case managers should offer monthly case management meetings, with more offered as needed (especially in the first year). Household case management needs may decrease over time. While participation in services is voluntary, case managers should offer services to all participants and work to engage participants, even if services have been declined in the past.
- For projects with operating or leasing dollars where occupancy agreements or sub-leases are used, the role of the case manager and the role of landlord/ property manager should be separate and distinct to ensure the case manager can engage with the participant to build trust and rapport instead of focusing on holding the participant accountable to their lease.
- For PSH projects with rental assistance dollars
 - Provide housing locator services. While the amount of assistance related to housing search varies by provider, at a minimum this should include:
 - Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
 - Provide education and outreach to landlords to address potential barriers to their participation
 - Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
 - Help individuals and families negotiate manageable and appropriate lease agreements with landlords
 - In general, some households may need more intensive assistance with housing search than others, due to barriers to tenancy (such as criminal record) or lack of experience with rental housing in the past. PSH providers with rental assistance dollars should be prepared to provide more assistance to households who may need a higher level of support to identify an eligible unit. This may include:
 - Assisting the household to look up eligible units online or via other local resources.
 - Assisting the household in calling landlords to inquire about available units.
 - Accompanying the household to view units and meet with landlords.
 - Assisting the household in reviewing and understanding lease terms.

- If participants are found to no longer need supportive services, or to need limited services, the Project should work with the participant to explore Move On options. These discussions should be driven by participant choice.
 - **Move On Strategies:** HUD encourages communities to explore Moving On strategies for households in PSH who may no longer need or want the intensive services offered in PSH but continue to need assistance to maintain their housing. Moving On strategies challenge a community to create partnerships between the CoC/PSH housing Project and mainstream housing Projects, such as public housing, the Housing Choice Voucher (HCV) Project, and HUD-funded multifamily housing providers.
 - Some indicators that a participant may be ready to explore Move On options (not all indicators may be present; assessment of Move On should be person-driven and based on participant needs and wants):
 - Participant no longer needs the intensive services provided on PSH, and/or is connected (or can be connected) to community-based services that are not tied to participation in the PSH Project (e.g., housing choice vouchers, behavioral health case management, peer support, care management, etc.). The participant feels as though they have enough supports in place to maintain stabilization without PSH Project services;
 - Goals in previously created goal plans have been accomplished;
 - The household is paying rent in full (or to the level agreed upon as described above);
 - The participant's primary service need is rental assistance/access to affordable housing;
 - The client would like to explore other housing opportunities.
 - For more information on Move On strategies, see HUD's **SNAPS in Focus: Moving On Strategies to Support Stable Transitions from PSH**.
- Shared Housing arrangements are allowable in PSH, and providers are encouraged to explore and support these arrangements if this would support the long-term housing stability of project participants. Shared Housing arrangements may be particularly helpful in areas with high costs of living where renting an SRO or 1BR apartment may not be financially viable long term for individual participants.
 - Shared housing is broadly defined as a living situation where two or more individual or family units share a single housing unit. This includes sharing housing costs like rent and utilities. Each individual or family unit has their own personal space, but there are common spaces that are shared such as bathrooms, kitchen and living room. Housing units can be any unit with multiple bedrooms. It can be an apartment or an entire building. The homeowner can live on the premises or not, but if the homeowner is related to the tenants, CoC and ESG dollars cannot pay rent.
 - A one-bedroom unit cannot be used for shared housing. Shared housing is not the same as doubled up. Each individual or family unit has their own space and resides in housing that is permanent.
 - In a shared housing arrangement, each individual or family unit must hold their own lease.
 - 4 keys to implementing a successful shared housing model: 1) Identifying households who may be interested in shared housing; 2) Developing a process that matches appropriate people together, driven by client choice; 3) Engaging landlords who are amenable to split lease scenarios and streamlining the process as much as possible for landlords. Note that PSH projects with leasing dollars can begin facilitating shared housing arrangements immediately, via sub-lease agreements;

4) Clarifying expectations around how the shared housing arrangement will work. Shared housing agreements can help clarify expectations. These agreements can cover anything from house rules, visitor expectations, sharing of bills (food, utilities, etc.), and more.

- Projects should follow HUD guidance on calculating rent contributions in shared housing.

Additional minimum standards for this project type include:

- Households must have a lease for at least one year which is automatically renewable for a term of at least one month and only terminable for cause.
- Scattered-site projects should engage in landlord engagement, including identifying available units, facilitating move-in, and ensuring participants' ongoing success in housing.
- Projects must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a PSH participant's assistance is terminated only in the most severe cases.

PSH Rental Assistance (Subject to 24 CFR Part 578)

PSH rental assistance is not time-limited. Projects funded through HUD's CoC Program must comply with the occupancy charges and resident rent requirements in 24 CFR Part 578. Households should have access for as long as the housing and supportive services are necessary to maintain housing stability. The amount of rent or occupancy charges owed by the household is calculated using the family's income less allowable deductions. The household's rent cannot exceed the highest of:

- 1) 30% of the household's Monthly Adjusted Income **or**
- 2) 10% of the household's Monthly Gross Income **or**
- 3) The portion of the household's welfare assistance, if any, that is designated for housing costs

Projects that support housing with leasing funds do not have to charge an occupancy charge (which is similar to rent), but if they do, they are not permitted to charge any amount higher than the highest of these three figures.

Each Project participant should be assessed at least annually to determine whether they are able to move from PSH to other permanent housing without supports (either subsidized or market rate) in order to make PSH resources available for those with the greatest need for supported housing. If it is determined that it is feasible for a participant to exit from PSH, project staff should support them in this transition, including assistance with identifying alternative housing and connection to community supports. To support households transitioning from PSH, Project staff are encouraged to assist Project participants in signing up for all appropriate subsidized housing waiting lists, including: Housing Choice Vouchers, Public Housing, Senior Housing, and other privately-owned assisted housing.

To determine rent, if rental assistance is being applied (as opposed to leasing dollars), the rent contribution or the maximum occupancy charge is the highest of the following amounts (rounded to the nearest dollar):

- 30% of the family's monthly adjusted income (as outlined at Part 5.609 and 5.611(a));
- 10% of the family's monthly gross income; or
- If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.

Please keep in mind that for PSH projects in which rental assistance is provided, the rent contribution/occupancy charge is not optional and must equal the rent contribution specified above. For projects that provide PSH using funds other than rental assistance funds, the occupancy charge is optional and can be lower but not higher than the maximum occupancy charge specified above.

If an assisted unit is vacated before the expiration of the lease, the project may pay *no more* than 30 days from the end of the month in which the unit was vacated. Brief periods of stays in institutions (not to exceed 90 days) by project participants are not considered “vacancies”, and rent can continue to be paid on the unit while the project participant is in the institution.

PSH Eligible Costs

Eligible costs vary based on a subrecipient’s grant agreement. The list of eligible costs below is based on HUD’s eligible costs in 24 CFR Part 578.

- Acquisition, Rehabilitation, New Construction
- Leasing or Rental Assistance
- Supportive Services
 - Case management, childcare, education services, employment assistance and job training, food, housing search and counseling services, legal services, life skills training, mental health services, moving costs, outpatient health services, outreach services, substance abuse treatment services, transportation, utility deposits
- Operating Costs
- HMIS
- Project Administration

PSH Prioritization

The prioritization for PSH is aligned with the CPD-16-11 Notice on Prioritizing People Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing. Persons eligible for PSH will be prioritized for available units based on the following criteria (applying the definition of chronically homeless set by HUD in its December 2015 Final Rule):

Chronically Homeless Households

- 1st Priority: Chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs.
- 2nd Priority: Chronically homeless individuals and families with the longest history of homelessness but without severe service needs.
- 3rd Priority: Chronically homeless individuals and families with the most severe service needs.
- 4th Priority: All other chronically homeless individuals and families not already included in priorities 1 through 3. These households will be prioritized based on their priority factors determined by the VI-SPDAT.

Non-Chronically Homeless Households

In the event a chronically homeless household cannot be identified, households experiencing literal homelessness who are not chronically homeless but do have episodic homelessness and have severe service needs will be prioritized.

OTHER REQUIREMENTS FOR PERMANENT HOUSING

Rent reasonableness. HUD will only provide rental assistance for a unit if the rent is reasonable. The recipient or subrecipient must determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rents must not exceed rents currently being charged by the same owner for comparable unassisted units.

Property damage. For rental assistance, recipients and subrecipients may use grant funds in an amount not to exceed one month's rent to pay for any damage to housing due to the action of a program participant. This shall be a one-time cost per participant, incurred at the time a participant exits a housing unit.

Lease. For project-based, sponsor-based, or tenant-based rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. For leasing, recipients and subrecipients must have signed occupancy agreements or leases (or subleases) with program participants residing in housing.

Housing quality standards. Housing leased with HUD Continuum of Care Program funds, or for which rental assistance payments are made with HUD Continuum of Care Program funds, must meet the applicable housing quality standards (HQS) under [24 CFR 982.401](#) of this title, except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance. For housing rehabilitated with funds under this part, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J, and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under this part are used for acquisition, leasing, services, or operating costs, 24 CFR part 35, subparts A, B, K, and R apply.

Emergency Solutions Grants

The purpose of these Written Standards is to establish guidelines for administering the Department of Housing and Urban Development (HUD) ESG programs. The Written Standards provide guidance for admission to and continued participation in an organization's Emergency Solutions Grant program(s). To the extent an issue is not otherwise explained in these Written Standards, the ESG regulations or CARES guidance will be followed (24 CFR 576, The CARES Act, and HUD CPD Notice 21-08).

The Written Standards have been examined by the CoC Coordinated Entry Committee and approved by the KTH CoC Governance Board. Agreement to abide by the Written Standards will be a condition of applying for ESG funding administered by the KTH CoC.

The standards below are applicable for ESG funding that the KTH CoC administers through the State Office on Homelessness. ESG programs include the following:

1. Street Outreach to reach unserved individuals and families experiencing unsheltered homelessness
2. Emergency Shelter to temporarily house and provide essential services to homeless individuals and/or families
3. Homelessness Prevention to assist individuals and families to prevent eviction and/or entering into an emergency shelter
4. Rapid Rehousing to assist individuals and families who are literally homeless

ESG also includes funding for Homeless Management Information System (HMIS) activities and Administration.

Special RUSH Grant Requirements

Statutory limitations on eligible projects/program participants:

- a. RUSH funds must be used for the purpose specified by 42 U.S.C. 11364a(c)(1). To be eligible for assistance provided with RUSH funds, an individual or family must: (1) be homeless or at-risk of homelessness; (2) have been residing in an area affected by a major disaster declared pursuant to the Stafford Act on or after December 20, 2019 (e.g., an area covered by DR-4673-FL, dated September 29, 2022); and (3) have needs that will not be served or fully met by the TSA Program (42 USC 5170b) and other existing Federal disaster relief programs (including both Federal and non-Federal cost share).
- b. A household will not be required to re-qualify as homeless or at risk of homelessness for purposes of RUSH funds if the household was already determined to meet the ESG definition of homeless or at risk of homelessness and was receiving ESG assistance when the disaster occurred.
- c. For purposes of RUSH funding, HUD understands "existing Federal disaster relief programs" to mean Federal programs that provide assistance for the purpose of disaster relief and are permanently authorized as of the date of the RUSH award.

J. ESG OPERATION STANDARDS BY PROJECT TYPE

STREET OUTREACH

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, nonfacility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under 24 CFR 576.2.

Eligibility Criteria

Participants must qualify as homeless under paragraph (1)(i) of the “homeless” definition under 24 CFR 576.2. Participants must be unsheltered.

Documentation

Relevant documentation standards include the information presented in the “RECORDKEEPING” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Staff should be working with participants to obtain their necessary documentation, if applicable (i.e., Social Security cards, birth certificates, chronic status verification, etc.). These efforts would be documented in the case files along with any additional case notes.

Assessment

Outreach workers are able to enroll households across the community, outside office walls, engaging with participants early and often. SO projects are required to provide the access, diversion, assessment, prioritization, and referral phases of CE, as described in the CE Policies and Procedures. SO projects are required to provide the Prevention phase of CE only to the extent necessary to determine that a participant is not experiencing literal homelessness and refer them to an appropriate service provider.

If SO projects are funded to provide the Prevention and Rapid Exit phases of CE, they must use a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one-time payments and short-term housing assistance, to identify the lightest-touch method to successfully re-establish each households into safe, stable permanent housing.

To the extent possible, SO staff should complete the coordinated entry assessments (e.g., VI-SDPAT and Place Value Assessment) with all participants. SO staff must also work to determine a household’s eligibility for services at local homeless assistance projects.

Targeting Services

Street outreach services should be targeted and coordinated as follows:

Standard 1: Street outreach efforts are coordinated and targeted with the broader network of programs, services, or staff who are likely to encounter individuals experiencing unsheltered homelessness, but whose regular focus is broader than homelessness including the following involved entities:

1. Law enforcement and first responders
2. Hospitals
3. Health and behavioral healthcare providers
4. Child welfare agencies
5. Homeless education liaisons
6. Workforce systems
7. Faith-based organizations
8. Other community-based providers

Standard 2: Street outreach is critical for connecting unsheltered households to housing and services. Street outreach projects must be entry points for unsheltered households in the coordinated entry (CE) process. Each street outreach agency staff member must complete assessor training with the KTH CoC staff and serve as an assessor for Coordinated Entry. These staff members can then identify and engage with unsheltered households who agree and are eligible to participate in the local CE process. Due to the nature of street outreach, it is understandable if it takes several engagements to proceed with

the CE process. Street Outreach staff serving as assessors have access in HMIS to complete the CE enrollment with unsheltered households, record referrals to housing and supportive services, and place households on the priority list.

Standard 3: Street outreach efforts are housing-focused. Street outreach programs must not require individuals to enter an emergency shelter or transitional housing as an 'interim step' or prerequisite to accessing stable housing. However, street outreach does make immediate connections to an emergency shelter or temporary housing to provide safe options while individuals and families are on a pathway toward stability.

There should be repeated attempts to assist, respecting participant choice.

Eligible Services

The following services are eligible under the street outreach component. A full list with definitions can be found at [24 CFR Part 576.101](#).

1. Essential services
 - a. Engagement
 - b. Case management
 - c. Emergency health services
 - d. Emergency mental health services
 - e. Transportation
 - f. Services for special populations

Funded SO Projects should conduct SO at a minimum of weekly, depending on budget and staffing.

No one is terminated from this project type unless: 1) They are placed in housing of their choice, 2) They indicate that they no longer need our services and request that their case be closed, or 3) They pose a serious threat of harm to the outreach staff or other participants.

Additional minimum standards for this project type include:

- SO efforts are housing focused; emphasize safety and reduce harm; and are systematic, coordinated, and comprehensive
- Funded outreach staff/teams must participate in and/or lead the unsheltered PIT count in their community.

Relevant case management standards include the information presented in the HOUSING FOCUSED CASE MANAGEMENT" section of the CoC's Written Standards. Additional case management standards for this project type include:

- Outreach staff should establish trust with the individuals or families identified through outreach focusing on building positive relationships, including creating a safe presence and initiating non-threatening conversation.
- Engagement activities should include an initial assessment of needs and eligibility in order to prioritize the type and source of assistance required, prioritizing safety and urgent health needs.
- Outreach staff should conduct an assessment to identify and prioritize those services for which individuals/families identified through outreach are eligible, including: case management; food sources; transportation; employment; early learning and education services; emergency health services; emergency mental health services; and essential services tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are living unsheltered.
- To the greatest extent possible, outreach staff completes the CE Assessment "out in the field", enroll participants in the outreach Project for as long as needed (if that is the individual's choice), and hand off eligible households to longer term assistance Projects (such as permanent housing, RRH, or another appropriate permanent housing

option).

- Outreach staff should link unsheltered individuals to a place to get warm, address/provide basic survival items and provide assistance with accessing benefits, services, and housing.
- Services should be targeted to assisting households with attaining housing stability as quickly as possible.
- Participants should be linked to additional services by way of a warm hand off to the greatest extent possible.

EMERGENCY SHELTER

ESG funds may be used for the costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters. Emergency shelter programs serve various sub-populations: households with children, unaccompanied youth, and victims of domestic violence. The level of support services available to participants varies greatly from program to program. While a length of stay is not specified, the goal is to exit participants into permanent housing within 60 days of entry. It is expected that some households will need longer lengths of stay. Programs are expected to have policies regarding terminating shelter assistance.

Eligibility Criteria

Individuals and families who meet any of the criteria in paragraphs 1-4 of the “homeless” definition found at 24 CFR 576.2.

Admission, Diversion, Referral, and Discharge

Diversion

Diversion is a type of intervention that is not always dependent on funding to be successful; sometimes some mediation is needed to get someone back into their housing. It is often a series of conversations and problem-solving strategies. Diversion serves to assist households in quickly resolving their housing crisis and avoiding prolonged homelessness so that community resources are prioritized for households most in need of intensive housing services.

Every attempt will be made to divert clients experiencing homelessness whenever possible to prevent a household’s entry into a shelter by diverting them to other safe, appropriate housing options provided by the household’s social support network and/or in the community. Diversion can be provided at the point of Coordinated Entry or pre-admission and/or duration of stay in the emergency shelter.

Admission

Eligibility for shelter services will be determined by each shelter’s criteria.

Length of Stay

A household’s length of stay in shelter will focus on an individualized housing plan, therefore, length of shelter stays will vary and not be set as each shelter stay is based a household’s needs, preferences, and housing availability.

Safeguards to meet the safety and shelter needs of special populations:

- *Victims of domestic violence, dating violence, sexual assault, and stalking:*

No individual or family may be denied admission to or removed from the emergency shelter on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking if the individual or family otherwise qualifies for admission or occupancy. The terms “affiliated individual,” “dating violence,” “domestic violence,” “sexual assault,” and “stalking” are defined in 24 CFR 5.2003.

Victims of domestic violence, dating violence, sexual assault, and stalking will be offered the option of being referred to a specialized domestic violence shelter if desired.

- *Prohibition against involuntary family separation.*

The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses ESG funding or services and provides shelter to families with children under age 18.

- *Individuals and Families who have the highest barriers to housing and are likely to be homeless the longest:*

Projects shall prioritize unsheltered individuals and families who are at the greatest risk for severe health and safety consequences if not sheltered.

Referrals & Discharge

Program staff will review all exits (voluntary and involuntary) to determine if the client is appropriate for other community resources including Rapid Rehousing programs (if available). All referrals will be made to other service providers and permanent housing programs, using the coordinated entry process. Every attempt will be made to avoid discharging an individual or family back into homelessness.

Assessing, Prioritizing, Reassessing Participant Needs for Essential Services

Assessing

Individuals and families receiving emergency shelter services may choose to participate in essential services. Housing focused case management essential services should be offered at every emergency shelter. Utilizing the case management essential services allows for program participants to receive an individualized housing plan. Case managers and participants will meet to review the individualized housing plan and determine ongoing need for emergency shelter services and which essential services may be beneficial for the participant. Participants choosing not to participate in case management can still have access to other essential services offered by the emergency shelter and may not be denied emergency shelter for not participating.

Prioritizing

The following essential services will be prioritized and offered by emergency shelter providers. The full list and definitions can be found at [24 CFR Part 576.102](#).

1. Essential services
 - a. Case management
 - b. Childcare
 - c. Education services
 - d. Employment assistance and job training
 - e. Outpatient health services
 - f. Legal services
 - g. Life skills training
 - h. Mental health services
 - i. Substance abuse treatment services
 - j. Transportation
 - k. Services for special populations
2. Renovation
3. Shelter operations
4. Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

Reassessment

Reassessment is a continual but informal process for program participants utilizing emergency shelter. Participants who prefer to use the facility only for bathing, cooking, and/or sleeping may decide at any time that they want to participate in a conversation for case management and housing placement. Individuals who are receiving case management and/or housing search are reassessed for progress toward goals on at least a weekly basis.

Other Requirements

- Minimum hours of operation 8PM – 7AM

- Staff supervision whether paid or volunteer must be provided during hours of operation of program
- Provide a minimum of one meal per day
- A minimal amount of personal information must be collected to establish a daily client roster to be kept in case of emergency and/or building needs to be evacuated
- At intake each participant shall be informed of evacuation procedures
- Maps/diagrams of exits should be prominently placed throughout the facility

Additional minimum standards for this project type are:

- Engaging participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement back into permanent housing.
- Discharging, to the greatest extent possible, to a permanent housing resource.
- Making it known that use of the facilities and services are available to all on a nondiscriminatory basis.
- To the extent possible, ES should have 24/7 hours of operation.
- There must be access to staff, whether paid or volunteer during hours of project operation. This may be on site or through cell phone, if necessary.
- Shelters should provide access to food preparation and food storage space.
- Shelters should make an effort to establish secure space for storage of personal possessions.
- To the maximum extent possible, shelters should provide secure storage of medications, especially in shelters with children.
- Smoking is prohibited in buildings that provide shelter to children.
- Weapons may not be brought into ES.
- Shelter guests may not bring or use illegal substances or alcohol on the premises.

RAPID REHOUSING

The purpose of Rapid Rehousing is to serve individuals and families who are experiencing homelessness, move them as quickly as possible in permanent housing, and achieve stability. ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

Eligibility Criteria

The following categories of individuals or families are eligible for RRH :

- Program participants must meet the criteria under paragraph (1) of the “homeless” definition in 24 CFR 576.2 or
- Meet the criteria under paragraph (4) of the “homeless” definition **AND** live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.
- All referrals to RRH must come through CE (Approved Rapid Exit projects may be eligible to skip this requirement).

***A household that qualifies as homeless under Category 4 but does not live in an ES or other place described in paragraph (1) of the 'homeless' definition would not be eligible for ESG rapid re-housing assistance but may be eligible for ESG HP assistance.** Additionally, if the household meets the criteria under either Category 2 or 3 of the homeless definition or the criteria under the at-risk definition, the household may be eligible for HP assistance.

There are no income eligibility requirements for households at the time of initial eligibility/enrollment.

Regarding Chronic Status: Participants who were chronically homeless prior to RRH entry maintain their chronically homeless status while they are receiving RRH.

Participant Transfers (non Emergency Transfer Requests) Transferring participants from RRH project to RRH project should only happen in rare and limited instances (e.g. one project has run out of funds, and household needs continued services). Subgrantees should budget accordingly to ensure that enrolled participants can be served for the duration of the grant period,

if needed. Additionally, participants should be fully assessed at entry to ensure the proper placement in an RRH project (e.g. if the assessment shows the household may need medium-term assistance, the subgrantee should not enroll the household in a project that only offers one-time assistance). See CoC HMIS Policies and Procedures for additional guidance about transferring participants in HMIS.

In the instance a household has to transfer projects, subgrantees must complete eligibility screening and any required documentation for the new project the household is being admitted into.

Documentation

Relevant documentation standards include the information presented in the “RECORDKEEPING” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Documentation of Housing Status must be completed and **prior** to enrollment of a household into a RRH project.

- An executed lease must be on file covering the time any financial or rental assistance is being provided. The lease must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
 - Signatures of both parties.
 - Rental Assistance Agreement
 - HUD-91067 VAWA Lease Addendum (*Required for HUD CoC and ESG housing providers)

Other documents required in all case files:

- Passed Inspections (Minimum Habitability Standards and Lead-Based Paint).
- Fair Market Rent Documentation
- Case notes
- Financial records related to any financial assistance provided to households
- Any other documents as required by specific program regulations, subgrantee agreements, or the KTH CoC
- Housing Plans are required. HP Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.

Assessment

Households will be screened for RRH resources through CE. Access points will complete RRH prioritization assessments that evaluate household needs, financial needs, and risk of homelessness.

Participants fleeing DV/attempting to flee DV may be eligible for EITHER HP OR RRH resources, per HUD eligibility guidance (*see note under "Eligibility" section for more information). A Victim Service Provider (VSP) may make referrals based on participant choice and resource availability. If referral to prevention resources is appropriate, VSP may make referral to HP resources (including VSP specific resources).

Prioritization

The prioritization for households determined to be eligible for RRH will be consistent with the CoC's scoring range for need and vulnerability associated with RRH projects. Additionally, the CoC has opted to prioritize the following households for RRH:

- Literally Homeless Individuals
- Households who are unsheltered, or residing in non-congregate shelter, will be a priority for housing.

The following factors will apply as tie-breakers when necessary.

1. Length of Time Homeless
2. VI-SPDAT score
3. Presence of other priority factors (See "PRIORITIZATION" section of CoC Written Standards)

If no unsheltered individuals can be identified, literally homeless individuals residing in shelters or

transitional housing will be prioritized using the same criteria.

Literally Homeless Families and Youth

Families and youth who are sheltered or unsheltered, including non-congregate shelter, will be a priority for housing. The following factors will apply as tie-breakers when necessary.

1. Length of Time Homeless
2. VI-SPDAT score
3. Presence of other priority factors (See "PRIORITIZATION" section of CoC Written Standards)

When a household presents as a veteran, they will be prioritized as a potential for veteran housing opportunities like Supportive Services for Veteran Families (SSVF) and Veterans Affairs Supportive Housing (VASH). Veteran referrals identified will be referred to veteran providers prior to being offered CoC/ESG housing resources. If a veteran referral is not eligible for the resource due to program eligibility requirements, then the household will remain on the BNL for the next available resource.

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:

If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, "the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider's own inventory or through a transfer facilitated through the Keys to Home CoC's Coordinated Entry System." If a unit is not available within the provider's own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See Keys to Home Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking.

HOMELESSNESS PREVENTION

Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in paragraph (1) of the homeless definition. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

Eligibility Criteria

The following categories of individuals or families are eligible for HP services:

- At-risk of homelessness as defined at 24 CFR 576.2;
- Homeless as defined at 24 CFR 576.2 who meet the criteria in paragraph (2), (3), or (4) AND
- Households must be very-low income: gross annual income must be less than 30% of area median income based on the income limits most recently published by HUD.

When determining the annual income of an individual or family, subrecipients must use the standard for calculating annual income under 24 CFR 5.609.

***A household that qualifies as homeless under Category 4 but does not live in an ES or other place described in paragraph (1) of the 'homeless' definition would not be eligible for ESG rapid re-housing assistance but may be eligible for ESG HP assistance.** Additionally, if the household meets the criteria under either Category 2 or 3 of the homeless definition or the criteria under the at-risk definition, the household may be eligible for HP assistance.

Note: not all HP households will remain in the same unit. Some may require relocation services (for example, if a landlord still wants to evict even if payment is offered). In these cases, no arrears should be paid, and the household should be rehoused within the HP project (as opposed to RRH).

Participant Transfers (non Emergency Transfer Requests): Transferring participants from HP project to HP project should only happen in rare and limited instances (e.g. one project has run out of funds, and household needs continued services). Subgrantees should budget accordingly to ensure that enrolled participants can be served for the duration of the grant period, if needed. Additionally, participants should be fully assessed at entry to ensure the proper placement in an HP project (e.g. if the assessment shows the household may need medium-term assistance, the subgrantee should not enroll the household in a project that only offers one-time assistance). See CoC HMIS Policies and Procedures for additional guidance about transferring participants in HMIS.

In the instance a household has to transfer projects, subgrantees must complete eligibility screening and any required documentation for the new project the household is being admitted into.

Documentation

Relevant documentation standards include the information presented in the “Recordkeeping” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Documentation of Housing Status and income eligibility must be completed and **prior** to enrollment of a household into an HP project.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The lease must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred;
 - Signatures of both parties.
 - Rental Assistance Agreement; and
 - HUD-91067 VAWA Lease Addendum (*Required for HUD CoC and ESG housing program).
- Other documents required in all case files:
 - Passed Inspections (Minimum Habitability Standards and Lead-Based Paint, if applicable).
 - Fair Market Rent Documentation
 - Case notes
 - Financial records related to any financial assistance provided to households
 - Any other documents as required by specific program regulations, subgrantee agreements, or the KTH CoC
 - Housing Plans are required. HP Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must

include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.

- If rental arrearages are being paid, there must be proof of funds owed and that the landlord will cease eviction proceedings if paid.
- If utility arrearages are being paid, there must be proof of pending shut-off or that they are already shut-off, that the household is responsible for utilities per the lease, and that the bill is in the participant's name at the address on the lease.

Assessment

Households will be screened for prevention resources through CE. Access points will complete HP prioritization assessments that evaluate household needs, financial needs, and risk of homelessness. Upon receipt of referral, prevention providers will screen participants for eligibility.

Participants fleeing DV/attempting to flee DV may be eligible for EITHER HP OR RRH resources, per HUD eligibility guidance (*see note under "Eligibility" section for more information). A Victim Service Provider (VSP) may make referrals based on participant choice and resource availability. If referral to prevention resources is appropriate, VSP may make referral to HP resources (including VSP specific resources).

Prevention will be targeted to those households who are very-low income and below, and meet other criteria demonstrating urgency and risk of becoming literally homeless.

Prioritization	VLI or below	ELI or below	Likelihood to enter homelessness	Urgency of the Situation
1st PRIORITY		X	X AND	X
2nd PRIORITY		X	X OR	X
3rd PRIORITY	X		X AND	X
4th PRIORITY	X		X OR	X

Factors related to the likelihood that the household will enter an emergency shelter or an unsheltered situation

- If the household has previously experienced homelessness
- If the household has any prior evictions (formal actions taken by the landlord that resulted in loss of housing)
- Households fleeing DV
- The household is considered cost burdened and is spending more than 50% of their monthly budget on housing related costs like rent/mortgage

Factors related to the urgency of the situation

- Households with eviction proceedings underway
- Vulnerability to illness/death or has been diagnosed with a terminal illness
- Households with high levels of rent and utility arrears and large sums that need to be paid immediately in order to keep housing
- Household has an adult or minor child with a disability that requires caregiving or childcare, which is unattainable and impacts the head of household's ability to maintain employment
- Household has an individual with barrier that would present an issue in identifying new housing options, like a criminal history, arson, or sexual offender status.

When a household presents as a veteran, they will be prioritized as a potential for veteran housing opportunities like Supportive Services for Veteran Families (SSVF) and Veterans Affairs Supportive Housing (VASH). Veteran referrals identified will be referred to veteran providers prior to being offered CoC/ESG housing resources. If a veteran referral is not eligible for the resource due to program eligibility requirements, then the household will remain on the BNL for the next available resource.

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking: If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Keys to Home CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See Keys to Home Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking.

ELIGIBLE COSTS AND REQUIREMENTS FOR RAPID REHOUSING AND HOMELESSNESS PREVENTION
Rapid Rehousing and Homelessness Prevention have the same eligible costs under [24 CFR Part 576.105](#) and [576.106](#). This section reviews those costs and additional requirements for providing rental assistance.

Housing Relocation and Stabilization Costs

The following costs are eligible both under the Rapid Rehousing component and Homelessness Prevention. A comprehensive list of eligible costs and definitions is available at [24 CFR Part 576.105](#).

- Financial Assistance Costs
 - Rental application fees
 - Security deposits
 - Last month’s rent
 - Utility deposits
 - Utility payments
 - Moving costs
 - Breaking a lease for an emergency transfer ([24 CFR 5.2005\(e\)](#))
- Services Costs
 - Housing search and placement
 - Housing stability case management
 - Mediation
 - Legal services
 - Credit repair
- Housing Counseling

Use with Other Subsidies. Financial assistance under this section cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.

Housing Stability Case Management

Subrecipients shall provide comprehensive case management to ensure housing stability is achieved for

all program participants. Case managers are expected to complete a housing stability goal plan at program entry which includes goals set by the client to ensure housing stability and includes financial resources and necessary referrals. Case managers are expected to document and maintain records in the client file and HMIS.

(1) While providing homelessness prevention or rapid re-housing assistance to a program participant, the subrecipient must:

(i) Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and

(ii) Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

(2) The subrecipient is exempt from the requirement under paragraph (e)(1)(i) of this section if the Violence Against Women Act of 1994 (42 U.S.C. 13701 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) prohibits that recipient or subrecipient from making its shelter or housing conditional on the participant's acceptance of services.

Relevant case management standards include the information presented in the “HOUSING FOCUSED CASE MANAGEMENT” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Income is reassessed quarterly (every 90 days) for the purposes of eligibility and adjusting rental payments. Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Some indicators of stability could be:
 - Goals cited in previously created goal plans will be realized.
 - The household will be paying rent in full (or to the level agreed upon as described above)
 - The housing crisis is resolved
 - The household feels as though they have enough support in place to maintain stabilization without funded essential services.
 - Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy.
 - Working with households to develop a Housing Stability Plan that includes review of the affordability of the household’s housing unit and the possibility of moving to a more affordable living situation.
 - The Housing Stability Plan should be reviewed monthly and revised every 90 days, if needed.
- • •
- Provide housing locator services. While the amount of assistance related to housing search varies by provider, at a minimum this should include:

- Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
- Provide education and outreach to landlords to address potential barriers to their participation
- Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
- Help individuals and families negotiate manageable and appropriate lease agreements with landlords
- In general, some households may need more intensive assistance with housing search than others, due to barriers to tenancy (such as criminal record) or lack of experience with rental housing in the past. RRH providers should be prepared to provide more assistance to households who may need a higher level of support to identify an eligible unit. This may include:
 - Assisting the household to look up eligible units online or via other local resources.
 - Assisting the household in calling landlords to inquire about available units.
 - Accompanying the household to view unit and meet with landlords.
 - Assisting the household in reviewing and understanding lease terms.

Short-term and Medium-term Rental Assistance

The subrecipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

- 1) Short-term rental assistance is assistance for up to 3 months of rent.
- 2) Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.
- 3) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

Use with Other Subsidies. Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

Rent Restrictions. Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.

Rental Assistance Agreement and Lease. The recipient or subrecipient may make rental assistance payments only to an owner with whom the recipient or subrecipient has entered into a rental assistance

agreement. Requirements for the rental assistance agreement and lease can be found in this [HUD guidance](#). Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

Late Payments. The recipient or subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The recipient or subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Maximum Amounts of Assistance

KTH CoC has not set a maximum dollar amount that a program participant may receive for each type of financial or rental assistance. KTH has not set a maximum period for which a program participant may receive any types of ESG assistance, except for those maximum periods established by 24 CFR 576. Except for housing stability case management, the total period for which any program participant may receive housing relocation and stabilization services must not exceed 24 months during any 3-year period.

Housing Stability Case Management	May not exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing
Short-term and medium-term rental assistance	Up to 24 months during any 3-year period

KTH does not have a minimum amount or percentage that program participants must pay while receiving Rapid Rehousing or Homelessness Prevention services.

Financial assistance should be provided in adherence to a progressive engagement model, to provide the “lightest touch” intervention possible. Financial services typically include rental assistance, deposit assistance, and/or relocation assistance. Eligible activities for financial assistance will depend on the project’s funding source(s).

The amount of rental assistance provided is highly individualized, but should generally titrate down (i.e., lessen) the level of HP or RRH subsidies over time so that each household contributes more as they are able to and as stabilization is realized. Participants may receive approval for the minimum amount of rental assistance necessary to prevent a return to homelessness.

Participants will not be approved for more rental assistance than can be justified with their income and expenses at any given time. The actual level of assistance and duration offered varies depending on need and will be decided upon by the participant and the Case Manager. Generally, over time, (barring unforeseen circumstances) the project will pay less toward rent while the participant pays more, until such time as the participant, is paying in full and exits the project. However, if income cannot increase

substantially enough, the household cannot afford rent in full, and there is substantial reason to believe that the participant will obtain another form of permanent housing subsidy (i.e., HCV, PSH, etc.) the household may only be held accountable for a rent amount comparable to what they can expect to pay upon discharge from the RRH project.

Since rental and/or financial assistance is to match the needs of the household, the duration of assistance will vary by household, lasting for no longer than the household needs to stabilize. That said, most households should be stabilized within an average timeframe of 12 months or less. -Some extenuating circumstances may necessitate extending RRH assistance past 12 months. Reasonable extension justifications could include:

- A participant with recent job loss
- Transition Aged Youth
- A participant paying fines
- A participant recently incarcerated, hospitalized, etc.
- A participant waiting for a PSH unit, HCV, etc. and there is reason to believe that it can be obtained before the maximum time allowed for RRH.

Projects should create their own internal extension approval process for any households remaining in the project past 12 months, and should include regular internal extension reviews past 12 months (e.g., 15 months, 18 months, 21 months). If average length of stay within an RRH project exceeds 12 months, the CoC may engage the provider to offer technical assistance.

In no instances will a household receive more than 24 months of HP or RRH assistance in any 3-year period, and no fees can be imposed on project participants beyond payment of rent, utilities, or any other costs related to maintaining housing. Project participants may pay a share of costs related to their housing stability. If participants are participating in cost sharing, projects cannot pay any additional amounts outside of what is owed once the participant makes their payment.

For example, a participant's rent is \$1000 a month. The participant will be making a payment of \$600 towards their rent. The project is only allowed to pay the remaining \$400 balance that is/will be owed.

- In some cases (approved by CoC Governing Board and/or CoC Funding Committee), CoC RRH funds can be used for Rapid Exits. Through Rapid Exits, RRH funds can be used from day 1 of a household's contact with Coordinated Entry during the Diversion and Rapid Exit Phases of CE for one-time financial assistance (such as first/last/security deposit/utility deposit) and light-touch case management focused on housing search and ensuring a household is connected to the mainstream benefits and resources they qualify for (Medicare, Medicaid, SSI, Food Stamps/ SNAP, local Workforce office, early childhood education, TANF, substance use disorder programs, employment assistance programs).
- Rapid Exit funds are prioritized for households with a source of income who need minimal financial assistance to exit homelessness, and who have identified a unit or are in the process of identifying a unit, and do not require ongoing supportive services/ case management. Rapid Exit funds may be used to assist households with housing search.
- Households identified for Rapid Exits are not required to go through the full CE prioritization, case conferencing, and referral process. Household must still be screened

and meet RRH eligibility guidelines in addition to the criteria listed in the above bullet point.

Re-Evaluation

Subrecipients must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs:

- Not less than once every 3 months (90 days) for program participants receiving homelessness prevention assistance.
- Not less than once annually for program participants receiving rapid rehousing assistance.
- At a minimum, each re-evaluation of eligibility must establish that:
 - 1) The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
 - 2) The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

When determining the annual income of an individual or family, subrecipients must use the standard for calculating annual income under 24 CFR 5.609.

All reevaluations must be documented in the HMIS database according to CoC HMIS Policies and Procedures. See CoC HMIS Policies and Procedures for additional guidance.

Minimum Habitability Standards

The ESG Program Interim Rule establishes different habitability standards for emergency shelters and for permanent housing (the Rapid Re-housing and Homelessness Prevention components).

Lead-based paint remediation and disclosure. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

Minimum standards for emergency shelters. Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The recipient may also establish standards that exceed or add to these minimum standards.

(1) **Structure and materials.** The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.

(2) **Access.** The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 *et seq.*) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 *et seq.*) and 28 CFR part 35; where applicable.

(3) **Space and security.** Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.

(4) **Interior air quality.** Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

(5) **Water supply.** The shelter's water supply must be free of contamination.

(6) **Sanitary facilities.** Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

(7) **Thermal environment.** The shelter must have any necessary heating/cooling facilities in proper operating condition.

(8) **Illumination and electricity.** The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

(9) **Food preparation.** Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

(10) **Sanitary conditions.** The shelter must be maintained in a sanitary condition.

(11) **Fire safety.** There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

Minimum standards for permanent housing. When ESG funds are used for permanent housing under 24 CFR 576.105 or 576.106, the minimum standards in 24 CFR 5.703 apply, except that:

(1) **Definition of HUD housing.** For the purposes of ESG, "HUD housing" in 24 CFR 5.703 means the program participant's unit, systems equipment that directly services those units, items and components within the primary and secondary means of egress from those units' doors to the public way, and common features related to the program participant's use of the building (e.g., the laundry room, community room, mail room).

(2) **Housing inspections.** For the first 30 days in which a program participant receives homelessness prevention assistance, the recipient or subrecipient may provide services under 24 CFR 576.105(b) to help the program participant remain in their unit without inspecting the unit to determine whether it meets the minimum standards identified in this paragraph (c), except that the recipient or subrecipient must still comply with the requirements under 24 CFR part 35. Before otherwise using ESG funds under 24 CFR 576.105 or 576.106 to help a program participant remain in or move into specific housing, however, the recipient or subrecipient must inspect that housing to confirm that it meets the requirements in this section. In addition, recipient or subrecipient must inspect the housing at least once every 12 months

during the period of assistance to confirm the housing continues to meet the minimum standards in this paragraph (c).

(3) **Correction of deficiencies.** If an inspection reveals one or more deficiencies that prevent the housing from meeting the requirements in this section, ESG funds must not be used under 24 CFR 576.105 or 576.106 with respect to that housing unless the owner corrects the deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.

(4) **Rental arrears.** Housing for which rental arrears are paid is only subject to the requirements in this section, if a program participant is seeking to stay in that housing.

(5) **Additional standards.** The recipient may also add standards that exceed these minimum standards.

(6) **Other exemptions from 24 CFR part 5, subpart G.** The requirements in 24 CFR 5.703(b)(2) and (d)(6) and 5.705 through 5.713 do not apply.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

A maximum of 6% of the ESG sub-grantee funding must be used to pay the costs of HMIS, which includes a 3% participation fee paid to the lead HMIS agency (unless the recipient is the HMIS lead agency, in which case the 3% must be utilized to support the HMIS function, as described in 24 CFR 576.107).

Costs of HMIS participation are described in [24 CFR 576.107](#).

The remaining 3% of sub-grantee funding may support the sub-grantee's HMIS costs including licensing and reporting fees.

ADMINISTRATIVE ACTIVITIES

Administrative activities are activities that can be attributed to the overall administration of carrying out ESG activities. A full list of eligible costs is available at 24 CFR 576.108. Please note salaries and expenses directly related to a component (e.g., Street Outreach) can be attributed directly to that component and should not be billed under administrative activities. Eligible administrative costs include:

- 1) General management, oversight, and coordination. Costs of overall program management, coordination, monitoring, and evaluation.
- 2) Training on ESG requirements.
- 3) Consolidated plan.
- 4) Environmental review.

K. COORDINATION AMONG PROVIDERS

To ensure program participants have access to all community resources, subrecipients should coordinate and integrate, to the extent possible, with other programs which serve people experiencing homelessness. Subrecipients should also coordinate with mainstream providers.

Subrecipients that receive funding through ESG will be subject to the following coordination requirements:

1. Street Outreach: Street outreach providers must coordinate their services with emergency shelters and utilize coordinated entry whenever possible. For example, the street outreach worker will contact the CES to see if the program participant has already used services within the system, work with housing providers and shelters to meet housing needs and link them to be assessed within the CES.
2. Emergency Shelter: Shelter providers must partner with Rapid Re-Housing providers to ensure that shelter program participants have access to services that can quickly re-stabilize their housing situation. Shelter providers must also implement a diversion process to ensure they are serving those most in need of the shelter bed.
3. Homelessness Prevention: Subrecipients receiving Homelessness Prevention funding will be expected to participate in coordinated entry to receive referrals, and coordinate with other agencies providing prevention assistance and mainstream resources.
4. Rapid Re-Housing: Rapid Re-Housing providers will be expected to use the CES to obtain referrals.
5. In addition, the following requirements apply:
 - Coordination with emergency shelters for unsheltered program participants who need shelter while looking for permanent housing,
 - Coordination with housing navigators or other community partners to assist in finding housing for program participants, and
 - Participation in By-Name list meetings.

L. AREA WIDE SYSTEMS COORDINATION

Coordination with other targeted homeless services

The KTH CoC and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to persons experiencing homelessness in the area covered by the Continuum of Care to provide a strategic, community-wide system to prevent and end homelessness for that area. Available programs may include:

- A. Shelter Plus Care Program
- B. Supportive Housing Program
- C. Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals
- D. Veterans services including: HUD - Veterans Affairs Supportive Housing (HUD-VASH), Homeless Veterans Reintegration Program, Domiciliary Care for Homeless Veterans Program, VA Homeless Providers Grant and Per Diem Program, Health Care for Homeless Veterans, Homeless Veterans Dental Program, Supportive Services for Veteran Families Program, and Veteran Justice Outreach Initiative
- E. Education for Homeless Children and Youth Grants for State and Local Activities
- F. Healthcare for the Homeless
- G. Programs for Runaway and Homeless Youth
- H. Projects for Assistance in Transition from Homelessness (PATH)
- I. Services in Supportive Housing Grants
- J. Emergency Food and Shelter Program
- K. Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program

Coordination with mainstream resources

The KTH CoC and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Available programs may include:

- Public housing programs
- Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act
- Supportive Housing for Persons with Disabilities (Section 811)
- HOME Investment Partnerships Program
- Temporary Assistance for Needy Families (TANF)
- Health Center Program
- State Children's Health Insurance Program
- Head Start
- Mental Health and Substance Abuse Block Grants
- Services funded under the Workforce Investment Act

ESG subrecipients must assist each program participant, as needed, to obtain:

(1) Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and

(2) Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:

- (i) Medicaid ([42 CFR chapter IV](#), subchapter C);
- (ii) Supplemental Nutrition Assistance Program ([7 CFR parts 271-283](#));
- (iii) Women, Infants and Children (WIC) ([7 CFR part 246](#));
- (iv) Federal-State Unemployment Insurance Program ([20 CFR parts 601-603, 606, 609, 614-617, 625, 640, 650](#));
- (v) Social Security Disability Insurance (SSDI) ([20 CFR part 404](#));
- (vi) Supplemental Security Income (SSI) ([20 CFR part 416](#));
- (vii) Child and Adult Care Food Program ([42 U.S.C. 1766\(t\)](#) ([7 CFR part 226](#)));
- (viii) Other assistance available under the programs listed in [§ 576.400\(c\)](#).

Centralized or coordinated assessment

Each ESG-funded program or project within the Continuum of Care's area must use that assessment system. The recipient and subrecipient must work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards required by paragraph (e) of this section. A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system.

Written standards for providing ESG assistance

(1) If the recipient is a metropolitan city, urban county, or territory, the recipient must have written standards for providing Emergency Solutions Grant (ESG) assistance and must consistently apply those standards for all program participants. The recipient must describe these standards in its consolidated plan.

(2) If the recipient is a state:

(i) The recipient must establish and consistently apply, or require that its subrecipients establish and consistently apply, written standards for providing ESG assistance. If the written standards are established by the subrecipients, the recipient may require these written standards to be:

(A) Established for each area covered by a Continuum of Care or area over which the services are coordinated and followed by each subrecipient providing assistance in that area; or

(B) Established by each subrecipient and applied consistently within the subrecipient's program.

(ii) Written standards developed by the state must be included in the state's Consolidated Plan. If the written standards are developed by its subrecipients, the recipient must describe its requirements for the establishment and implementation of these standards in the state's Consolidated Plan.

(3) At a minimum these written standards must include:

(i) Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG);

(ii) Standards for targeting and providing essential services related to street outreach;

(iii) Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, *e.g.*, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;

(iv) Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;

(v) Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see [§ 576.400\(b\)](#) and [\(c\)](#) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);

(vi) Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance (these policies must include the emergency transfer priority required under [§ 576.409](#));

(vii) Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;

(viii) Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and

(ix) Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

Participation in HMIS

All ESG subrecipients must ensure that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient is a victim service provider or a legal services provider, it may use a comparable database that collects client-level data over time (*i.e.*, longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.