



Continuum of Care Written Standards

2019

Table of Contents

Introduction	4
Section I: System Level Principles and Standards	5
System Principles	5
System Level Standards.....	6
Section II: Agency-Level Principles and Standards	8
Principles.....	8
Standards.....	9
Section III: Program-Level Principles and Standards	13
Principles	13
Program Level Standards.....	14
ESG Programs	15
Emergency Shelter	16
TRANSITIONAL HOUSING (TH)	19
PERMANENT SUPPORTIVE HOUSING (PSH).....	21
RAPID REHOUSING (RRH)	23
Appendix A. HUD Homeless Definition Categories.....	27
Appendix B. Imperial County’s CoC Prioritization Policy	29
Appendix C. CES Prioritization Guidelines.....	30
Appendix D. NAEH RRH Program Standards	31
Housing Identification Program Standards	31
Rent and Move-In Assistance	32
RRH Case Management and Services.....	33
Program Standards	34
Appendix E. Definition of Chronically Homeless	36

Appendix F. Definition of Disability	38
Appendix G. List of Acronyms.....	39
Appendix H: Review of Project Applicants + Appeal Processes.....	39

Introduction

Imperial Valley Continuum of care Council (IVCCC). The Imperial Valley Continuum of Care Council (IVCCC) is the name of the Imperial County's Continuum of Care (CoC) which plans and coordinates the housing and supportive services system for homeless individuals and families. The mission of the IVCCC is... *To engage individuals and organizations of Imperial Valley in a community-based process that works to erratic homelessness in the region, addresses the underlying causes of homelessness, and lessens the negative impact of homelessness on individuals, families, and community.* Additionally IVCCC seeks to lessen the negative impact of homelessness on individuals, families, and communities.

The IVCCC strives to be participant-centered and to provide services that are tailored to the unique needs and strengths of everyone or family that is homeless. The service providers and other stakeholders of the IVCCC service area are committed to providing empathic, consistent, predictable, non-judgmental support to homeless individuals and families; are willing to do whatever it takes to help people achieve and maintain income, housing, self-sufficiency and an improved quality of life. Effective service provision and positive outcomes for participants require that service providers have a positive, hopeful, and supportive relationship with the participant.

These Written Standards (Standards) are intended to support IVCCC's efforts by providing a framework for participants in the Imperial County's homelessness system who work together with mutual respect, collectively serving the needs of homeless individuals and families. The Standards were adopted by the IVCCC Board & IVCCC membership. They represent the norms of service delivery for our entire community and serve as a guide to the network of resources specifically targeted to address homelessness in the region.

The IVCCC will provide access to the Standards for community stakeholders, including agencies receiving HUD Continuum of Care Program, Emergency Shelter Grant (ESG), and grant funding targeted to homelessness and other social needs. The RTFH Standards are also designed to comply with the federal Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act.

For the benefit of program participants, the Standards adopted by the IVCCC Governance Board, will be applied to all programs and must be followed by programs that receive U.S. Department of Housing and Urban Development (HUD) funding through the CoC Program Competition, the Emergency Solutions Grant (ESG), and the State of California ESG program. Although not required, programs that receive funding through other sources are also encouraged to follow these standards, and funders of housing services are encouraged to adopt the Standards for the programs they support.

The IVCCC has established operating principles and standards to support effective implementation of the homeless service system. Standards and descriptions for key components of the system include community-wide practices and procedures such as Housing First, CES, and the Homeless Management of Information System (HMIS); agency-level activities such as grievance

procedures and reporting; and individual project activities for each project type such as outreach and emergency services, transitional housing, bridge housing, rapid rehousing and permanent supportive housing.

Section I: System Level Principles and Standards

System Principles

In keeping with the goals and objectives of the IVCCC, activities provided through local agencies should work together to support the mission of ending homelessness and lessening the negative impacts of homelessness on people experiencing homelessness and on communities. A series of principles and best practices have been developed and are integral to ensuring that homelessness is rare, brief, and non-recurring¹ and in establishing new homeless services programming in the future. Core concepts include:

- Housing First approach
- Harm reduction, low barrier strategies and policies
- Respect for the dignity and autonomy of the person
 - Trauma-informed systems of care
 - Recognition of the importance of relationship building
 - Respect for cultural competence and non-discriminatory practices
 - Flexible, program participant-driven, and strengths-based service delivery
 - Participant self-determination (i.e. participants select from a menu which offers a variety of services that are flexible and appropriate for the participant in various stages of change)
 - Developmentally appropriate services (i.e. families, youth)
- Systems collaboration and coordination: resource sharing and effective utilization of resources
- Civic engagement and systems advocacy: engagement of agencies and participants
- Use of evidence-based and data-driven practices
- Centralized recordkeeping using an approved HMIS
- Governance of the IVCCC will include representatives from various stakeholder groups, including homeless or formerly homeless persons.

System Level Standards

Housing First Orientation

Housing First is an evidence-based approach for ending homelessness and is the most effective approach to ending chronic homelessness. Housing First seeks to offer individuals and families experiencing homelessness immediate access to permanent affordable or supportive housing, with a low-threshold for entry, and without clinical prerequisites like completion of a course of treatment or evidence of sobriety. Housing First is an overarching philosophy and approach that can be applied to all homeless assistance programs, and Housing First also encompasses two specific intervention types: 1) Permanent Supportive Housing (PSH) and 2) Rapid Re-Housing (RRH). Housing First Permanent Supportive Housing models are typically designed for individuals or families who have complex health and behavioral health needs thus requiring intensive service needs, as well as have lengthy and/or repeated episodes of homelessness. PSH programs are long term in nature and housing and services are offered indefinitely based on need, to participants who are often turned away from other affordable housing settings, and/or who are the least likely to be able to proactively seek and obtain housing on their own. Housing First approaches for RRH provide quick access to permanent housing through targeted housing search and identification, the provision of temporary interim rental assistance, time limited housing based services and supports. Time-limited housing or rental assistance has also been recognized to address the housing needs of unaccompanied youth and persons fleeing domestic violence. RRH programs are designed to have low barriers for program admission, and to serve individuals and families without consideration of past rental, credit or financial history. HUD recognizes that Housing First yields high housing retention rates, low returns to homelessness, and reductions in crisis or institutional care.

Coordinated Entry System (CES)

The CES is a centralized system for people with a housing crisis to access local housing programs targeted for people who are homeless. The Board has adopted policies, procedures, and participation rules for the CES System for the Imperial County CoC. Participants will be assessed and access CoC housing resources following the adopted CES Policies and Procedures Handbook. The Handbook includes guidelines for participation in the CES system. Outreach, assessment, or housing programs must abide by coordinated entry and housing placement standards as described in the Handbook.

Participants are enrolled in CES after completing the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT) or the Vulnerability Index & Family Service Prioritization

Decision Assistance Tool (VI-F-SPDAT)² and approved supplemental questions. These instruments form the Common Assessment Tool (CAT). Verification of information from the CAT and basic personal characteristics (referred to as the “Universal Data Elements” in HMIS) must be maintained in participant files. Documents needed by CES to verify the assessment include the participant profile VI-SPDAT or VI-F-SPDAT, eligibility for homeless status, length of time in homelessness chronic homelessness criteria, and veteran’s status. All publicly funded agencies are required and others are strongly encouraged to use HMIS for participant and program data. Agencies that do not use HMIS can partner with Coordinated Entry staff to make alternate arrangements for referring participants to the prioritization list.

Minimum Standards

1. **Prioritization:** Follow Board-established priorities to ensure that the most vulnerable participants are served first, by using the approved common assessment tool (CAT), the length of homelessness, chronic homeless status, vulnerability, and severity of need.
2. **Low Barrier:** CES staff partner with programs and systems that have low barriers. Participants are served through Coordinated Entry regardless of income level, drug or alcohol use and criminal background.
3. **Housing First Orientation:** The purpose of the system is to house participants as quickly as possible. Policies assume that all persons are ‘housing ready’.
4. **Rapid Movement to Permanent Housing:** participants move directly to permanent housing as soon as it is available without needing to transition through other programs, or without having to participate in services for a specific period.
5. **Person-Centered:** Participants can accept or deny services from any agency without losing their spot on the prioritization list.
6. **Fair and Equal Access:** All programs and services will adhere to Fair Housing Standards. All participants in the Imperial County geographic area can access services through the established CES. Services are offered in English and Spanish. Translation services are made available as needed.
7. **Standardized Assessment:** All agencies will use the VI-SPDAT and supplemental questions as approved by the Board.
Inclusive: All subpopulations will be assessed through the CES and access housing in the same way. To ensure safety and efficiency, participants may be directed to different assessment centers or access points.
8. **Referral Protocols:** CES will refer participants to appropriate housing services including ESG and projects funded by HUD CoC Competitive grants. CoC HUD-funded and ESG funded

² The VI-SPDAT tools were created by Org Code Consulting , found at www.orgcode.com/product/vi-spdatt/

projects are required to fill housing vacancies with participants that are matched to their projects through the CES system. All homeless housing projects must use the CES system for as the system becomes available for that project type. People accepted into housing must be recorded in the HMIS so that the prioritization lists remain current.

9. Outreach: Street outreach workers will administer the VI-SPDAT, when available, or refer people to assessment sites, and enter the participant in HMIS so that participants can be prioritized and be added by HMIS to the appropriate By Name Lists.
10. Access points: The RTFH ensures full access to the CES through multiple assessment and access points throughout the CoC geography. Access centers will assess any participant experiencing homelessness or at risk of homelessness in the CoC. Information about access points will be provided on the RTFH website and through a centralized telephone number.

Section II: Agency-Level Principles and Standards

Principles

Homeless housing and service providers will consider the system principles detailed above when planning and implementing programs and will work together with other service providers and stakeholders to uphold these principles for the benefit of all individuals and families who are homeless. The agencies are also responsible for:

- Maintenance of records in the HMIS
- Systems collaboration sharing and utilizing agency expertise for greatest impact
- Active participation in the CES
- Programs are safe and welcoming for all who are eligible to access service
- Organizational commitment to excellence and accountability
 - Continuum accountability: Agencies understand program impacts and communicate changes in programs (i.e. closures, elimination of units) to prevent the displacement of participants and utilize all available resources
 - Ensure fiscal responsibility (adheres to regulatory standards for tracking and use of funds)
 - Commitment to staff training and development
 - Use of evidence-based practices (such as trauma-informed care)
 - Adherence to applicable regulations and law (Fair Housing laws/Americans with Disabilities Act/Section 504, etc.)
 - Play an active role in connecting participants to, and ensure coordination with other services and systems of care, such as:

- Eligibility screening for and application to mainstream services. Examples of these programs include: HUD public housing programs, Section 8 tenant based rental assistance, HOME³, CalWorks, Medi-Cal, Head Start, Social Security, Supplemental Security Income, Social Security Disability Insurance, and CalFresh.
- Coordination with other systems of care, such as foster care, in-home health services, probation or corrections, substance use and/or mental health treatment, and employment or education services.

Standards

Housing First Standards for Agencies⁴

- The agency verbally explains program eligibility criteria, which align with the Housing First philosophy, to participants, and provides the criteria in writing when requested.
- The project has admission/tenant screening and selection practices that promote the acceptance of applicants regardless of their sobriety, use of substances, criminal history, completion of treatment, or participation in services.⁵
- The project accepts participants who are diagnosed with or show symptoms of a mental illness.
- The project has and follows a written policy for the following:
 - Stating that taking psychiatric medication and/or treatment compliance for mental illness is not a requirement for entry into or continued participation in the project.
 - Stating that sobriety and/or treatment compliance for substance use disorders is not a requirement for entry into or continued participation in the project, unless the project is specifically a sober living home.
 - Not rejecting participants based on previous criminal history that is not relevant to participation in the program, and accepting participants to the project regardless of criminal convictions, unless there is a strong safety concern for other residents in the project.

³ HOME refers to the HOME Investment Program which offers grants to states and units of general local government to implement local housing strategies designed to increase homeownership and affordable housing opportunities for low and very low-income Americans. Retrieved March 23,2017 from <https://portal.hud.gov/hudportal/HUD?src=/hudprograms/home-program>

- Not rejecting participants based on prior rental history or past evictions to the project.
- Accepting participants into the project regardless of lack of financial means, unless program operation is dependent upon participant income.
- Accepting participants into the project regardless of past non-violent rule infractions within the agency's own program and/or in other previous housing.
- The project agrees to allow participants to remain in the project even if they require an absence of less than 90 days due to the reasons outlined below, unless otherwise prohibited by law or funder policy:
 - Substance use treatment intervention
 - Mental health treatment intervention
 - Hospitalization and short-term rehabilitation
 - Incarceration
 - Other service- related reason approved by an agency supervisor

Progressive engagement

- Progressive engagement refers to a strategy of providing a small amount of assistance to everyone entering the homelessness system.
- For most households, a small amount of assistance is enough to stabilize, but for those who need more, more assistance is provided. This flexible, individualized approach maximizes resources by only providing the most assistance to the households who truly need it. This approach is supported by research that household characteristics such as income, employment, substance use, etc., cannot predict what level of assistance a household will need.
- Initially all households are rapidly re-housed and provided a small amount of assistance, such as one month of rental assistance and a security deposit. After a household is in housing, a deeper assessment can be conducted. A provider will evaluate households at the beginning of each month to determine if they will require assistance for another month. Households are informed as early as possible about their financial assistance.

Minimum Standards

- Participants are provided with opportunity for self-determination and choice in selecting specific housing and services. A Housing Navigator or case manager supports the participant selection during the housing match and program placement process.
- Participants are given regular opportunities in decision-making for programs and services, such as participation on an operating board, a tenant board, or a consumer input panel

- Participant feedback on programs and services are solicited at least annually.

Appeals and Grievance Procedures

Occasionally, participants or residents may be denied assistance or may want to issue a complaint about a program or service. Agencies are responsible for implementing a termination or grievance process that meets at least the following minimum standards.

Minimum Standards

1. All agencies must advise program participants of behaviors or conditions that are grounds for termination and have posted and advertised appeals or grievance policy and process.
2. Have a consistent method for filing an appeal or grievance and a timeline for the agency to respond to an appeal or grievance.
3. Provide contact information for the person designated to receive a grievance or complaint.
4. Agencies reserve the right to reinstate services because of an appeal or to meet program rules or applicable laws without having to conduct a new CES assessment process.

Termination of Housing Assistance

Termination of housing assistance should be rare and used only as a last resort to ensure safety or compliance with regulations or laws. Agency and programs are expected to maintain a low-barrier, housing –first approach to services, and to follow the minimum standards described below.

Minimum Standards

1. Housing programs adhere to low-barrier criteria⁶ meaning that the program will **not** terminate housing assistance to the participant for
 - Failure to participate in supportive services
 - Failure to make progress on a service plan
 - Loss of income or failure to improve income
 - Fleeing domestic violence
 - Any other activity not covered in a lease agreement typically found in the mainstream housing market.

⁶ HUD description of low- barrier criteria are found in the 2016 CoC NOFA

2. All agencies must advise program participants upon entry of behaviors or conditions that are grounds for termination.
4. Nothing in this section prevents an agency from reinstating services pursuant to applicable program rules or law.

Record Keeping Requirements

Housing and service information will be retained in a centralized HMIS, which will be maintained as described in the approved HMIS Participation Policies and Procedures.⁷ In accordance with federal regulations⁸, programs designed to exclusively serve domestic violence victims will maintain client-level records in a secure, comparable database and provide information to the HMIS for program-level and system reports. Electronic submittal of records in accord with established HMIS policies is strongly encouraged for all agencies, regardless of funding source.

Agencies are responsible for knowing the reporting requirements for each funder and program. Documentation of the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

Minimum Standards

1. Each participant file should contain, at minimum, information required by funders, participation agreements and/or signed lease agreements, service plans, case notes, information on services provided both directly and through referral, and any follow-up and evaluation data that are compiled.
2. Participant information will be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual. At a minimum, programs must record the date the participant enters and exits the program, and update the participant's information as changes occur.
3. Financial recordkeeping requirements include documentation of all costs charged to the grant, funds being spent on allowable costs, the receipt and use of program income, compliance with expenditure limits, and deadlines and match contributions.
4. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate except to project staff and other agencies as required by law. Participants must give informed consent to release any participant identifying data to be utilized for research, teaching and public interpretation.

⁸ HUD Regulations 24 CFR 587 and HMIS operating standards

5. Files must be saved for a minimum of five years beyond the term of assistance, or longer if required by a program-funding source.

Section III: Program-Level Principles and Standards

Principles

In addition to the general system principles and agency standards outlined above, the following principles guide program level services:

1. In providing or arranging for housing, shelter, or services, the program will consider the needs of the individual or family experiencing homelessness.
2. The program will aid households in accessing suitable housing.
3. The program is aligned with RTFH established policies and priorities, and current HUD priorities, including priorities for facility usage and ending homelessness among specified sub-populations.
4. The VI-SPDAT with supplemental questions from the approved Common Assessment Tool (CAT) that is used to screen households for homeless housing programs. The approved version of the screening tools is posted on the CoC website. It is administered by trained and approved personnel and volunteers. Data from assessments is entered into the CoC-approved HMIS.
5. The program fully participates in the CES system and follows CoC-approved priorities when determining placement priority and housing program type for a participant.
6. Programs ensure access to education for children. Each housing and housing case management program must be aware of, and inform family and youth-only households of the educational rights of children and unaccompanied youth in their programs. Programs serving families or youth will adhere to the provisions of the adopted CoC Educational Assurances policy. Each organization will implement the policy by public posting of client rights to education, and through designation of staff who are responsible for collaboration with McKinney-Vento School Liaisons or other school officials to coordinate educational services. Program staff will highly encourage school attendance and will work with households to address any barriers to regular school attendance.
7. Each program in the CoC will provide accurate and up-to-date information on eligibility criteria for participation in the program; e.g. – gender specific, household type (individual/family), disability. Each agency will provide information to the HMIS.
 - a. Each program in the CoC will minimize their eligibility criteria and strive to accept and accommodate all people.
 - b. Each housing and housing case management program in the CoC will maintain eligibility, service, and benefits documentation for each participant. A mainstream benefits checklist and all verification documents should be kept in the file for each household and updated annually.

- c. Each program will ensure language translation services are available for participants when needed. These services may be provided through a third-party or community resource if necessary.
- d. Each program participating in the HMIS will follow the HMIS Policies and Procedures as adopted by the IVCCC Board.

Program Level Standards

In addition to general program standards, the IVCCC has identified standards for each specific program type comprising the system targeting homeless individuals and families. For many programs, participants must be homeless and meet specific eligibility requirements. HUD defines homelessness in four categories.

Category 1: Literally Homeless

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

1. Has a primary nighttime residence that is a public or private place not meant for human habitation;
2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
3. Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness

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

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

Category 3: Homeless Under other Federal Statutes¹

Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:

1. Are defined as homeless under the other listed federal statutes;
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
3. Have experienced persistent instability as measured by two moves or more in the preceding 60 days; and
4. Can be expected to continue in such status for an extended period due to special needs or barriers.

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

1. Is fleeing, or is attempting to flee, domestic violence;
2. Has no other residence; and
3. Lacks the resources or support networks to obtain other permanent housing.

Description

ESG programs receive funding from the State of California Housing & Community Development Balance of State Funds . The program provides support for street outreach, homeless prevention, support services only [SO] projects (i.e., HMIS, CES), emergency shelter and rapid rehousing. ESG funds can only be used in targeted areas within the IVCCC geography.

Eligibility

Participants must meet HUD definition of homeless and have income below 30% Area Median Income.

Access

In consultation with recipients of ESG’s program funds within the geographic area, the IVCCC establishes and consistently follows Written Standards for providing CoC assistance. The ESG program principles and standards are detailed in the ESG Policy and Operations Guidebook⁹. ESG Standards include:

1. Coordination with the IVCCC to ensure effective use of resources
2. Compliance with the IVCCC Written Standards except as required by the ESG program regulations such as income eligibility limitations, housing inspection standards or terms of assistance. The standards for determining housing and rental assistance participation are further described in the ESG Policies and Operating Guidelines.¹⁰.
3. Registration of participants in the CES System
4. Policies and procedures for evaluating individual’s and family’s eligibility for assistance
5. Policies and procedures for determining and prioritizing which eligible individuals and families will receive a particular type of housing assistance (PSH, RRH, TH, or other)
6. Standards for determining what percentage or amount of rent each program participant must pay while receiving RRH assistance;

Emergency Shelter

Description

The purpose of emergency shelter is to provide a safe, short-term residence for homeless persons, and to help them access safe, appropriate housing outside the shelter, and resolve their immediate housing crisis. Emergency shelters do not require occupants to sign leases or occupancy agreements.

Eligibility Criteria

There are no individual eligibility criteria for receiving emergency shelter services, each person who presents for shelter is assumed to be homeless.

Minimum Standards

1. Shelter programs must create policies and procedures that provide a safe environment for shelter participants and staff; policies and procedures may vary depending on the population being served. These policies and procedures must be explained to applicants prior to moving into the shelter. In addition, they must be posted in the shelter and on the agency's website.
2. Supportive services are available to assist persons in obtaining housing either on-site or through a resource center. All shelter residents are notified of the availability of support services and how to access the services and are encouraged to find permanent housing.
3. If a shelter is designated year-round, it must be available 24 hours a day, each day of the year. If it is necessary to temporarily close a shelter as much advance notice as possible must be given to the RTFH and participants. Unless closure is required due to unforeseen circumstances or safety, a minimum of 30 days' notice is required. In any closure situation, efforts should be made to find a short-term replacement shelter or other accommodations to prevent participants from returning to the streets.
4. Seasonal, inclement weather or rotational shelter services may be open for less than 24 hours a day and operate for periods during the year as permitted by special arrangement with local jurisdictions.
5. Shelter participants will be treated by staff and volunteers with respect and dignity and will receive a welcoming, safe, and non-intimidating environment. Respectful treatment is evidenced by use of polite and non-aggressive language (by a respectful tone of voice, by no swearing by staff, no threats, assaults, etc.)
6. Shelter staff and volunteers are provided with a clear anti-harassment and non-discrimination policy. The agency provides access to regular training on the policy at least annually.
7. Shelter staff or others are encouraged to provide diversion counseling to aid new shelter applicants to find alternative housing to divert them from becoming homeless.
8. Each shelter will have a policy of respect for each individual's self-identified gender. Participants who request shelter services will be admitted to the shelter operated for the

gender to which individuals identify themselves. Staff will not share or in any way reveal that certain participants may have identified themselves as transgendered/transsexual.

9. Transgender and transsexual participants will be offered the same services and resources as all other participants as long as participant safety can be maintained. While shelter staff will take reasonable steps to accommodate specific needs, and it may not be possible to provide the specific accommodation requested, shelters would meet the federal Equal Access to Housing Standards.
10. All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marital status identifying, as a family at a family shelter must be served as a family. Families at family shelters must not be separated when entering a shelter. There can be no inquiry, documentation requirement or “proof” related to family status, gender identification and/ or sexual orientation. The prohibition on inquiries or documentation excludes inquiries related to the purpose of determining safe placement in temporary emergency shelters that are limited to one sex, or for determining the number of bedrooms to which a household may be entitled. The age and/or gender of a child under 18 must not be used as a basis for denying any family’s admission to a HUD-funded program.
11. Shelters are encouraged to accommodate participant’s pets if at all possible.
12. There are no fees or rent charged to a shelter participant.
13. Documentation (including photo ID, birth certificate, etc.) may not be used as a barrier to shelter. Identification may be requested but cannot be required to access emergency services. Shelters will describe a plan for requesting identification when there is a concern for participant safety.
14. Participants may be asked to leave the shelter for behavior that is deemed seriously threatening or harmful to other participants and staff, such as displaying a weapon, threatening assault, physical aggression or prolonged verbal abuse.
15. The written policy for refusing to admit, asking a participant to leave or banning a shelter participant from reentering the program must be available and used only when all other options have been explored and the ban is necessary to protect the health and safety of staff and participants. Programs will document the behavior, any attempts to remedy the threat, and the efforts to secure more appropriate housing.
16. All shelter participants will be notified of the agency’s termination policy. When it is not possible to provide services because of the participant’s behavior, efforts will be made by shelter staff to assist the guest in finding alternatives. Access to a shelter is not a privilege and is not taken away except under extreme circumstances. (See appeals and termination policies in agency-level standards).

Access to Shelter

- All HUD-funded shelters will participate in the assessment component of coordinated entry. All emergency shelters must ensure that participants are enrolled in CES either by administering the Common Assessment Tool themselves or referring participants to CES for assessment, and explain to participants the process of accessing CoC housing and services.

Prioritization for Emergency Shelter

- Emergency Shelter (ES): provides shelter on a nightly basis.
- Shelter for Persons with Immediate safety needs (domestic violence or human trafficking): Individuals and families with children who have an immediate need for shelter to escape domestic violence access housing and services through the network of care for domestic violence victims. When shelter beds are not available, participants may be assisted through temporary placement in local motels or referred to other community resources. Eligible participants may be single men, single women, youth, or adults with children who are experiencing intimate partner violence or human trafficking.

Interim Housing provided to families or unaccompanied youth under 18 years of age should use the above criteria for single adults as a guide for their program entry criteria, recognizing that some specific items might be different for these populations especially when it comes to the safety of children.

TRANSITIONAL HOUSING (TH)

TH is a time-limited (up to 24 months) residential facility (congregate-site or scattered-site) paired with supportive services targeted to individuals and families to help them address barriers such as domestic violence, substance use, mental illness, lack of sufficient income, or legal issues prior to entering permanent housing. TH is used when permanent housing resources (RRH and PSH) are not available or the participant is choosing TH over RRH and PSH. Although TH can be up to 24 months in duration, it is recommended that programs only provide housing and services for what is essential for the person to move to stable permanent housing and to limit the program residence to substantially less than 12 months on average. Program designs work to reduce the length of time in homelessness, TH or temporary housing and enhance housing stability by providing aftercare or follow-up support services.

Eligibility Criteria

- Individuals and families must meet the HUD definition of homeless (Category 1, 2 or 4).

Target Populations

The CoC will target populations for TH identified as 'best practices':

- Individuals and families who meet the eligibility criteria and
- Who have mid-range acuity according to the VI-SPDAT, and are
- Unaccompanied youth age 17 and younger, or
- Transition age youth ages 18-24, especially those aging out of the foster care system, or
- Individuals and families fleeing domestic violence, or
- Individuals and families interested in substance abuse treatment
- People who are re-entering the community following a period of incarceration

Program Standards

1. The program explains the services that are available and the behavioral requirements for participation. It secures a commitment from each adult household member to adhere to the occupancy agreement and behavioral standards prior to admitting the individual or family into the program.
2. The program can only require disability-related services if the participant has voluntarily committed to services, or if the program is a licensed treatment facility.
3. Individualized case management is available at minimum of every week to each household who are admitted into the program.
4. The program assists participants in accessing appropriate support services, such as basic life skills information, counseling, and training, including budgeting, money management, use of credit, housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security card, birth certificate).
5. Educational advancement, such as GED preparation and attainment, post-secondary training (college, technical school, military, etc.), and vocational education will be provided or will be coordinated through external referrals.
6. Job preparation and attainment, such as career counseling, job preparation-training, dress and grooming, job placement and job maintenance will be provided or will be coordinated through external referrals.
7. Behavioral health care, such as substance use counseling (individual and group), education, prevention and referral services, and mental health counseling will be provided or will be coordinated through external referrals.
8. Assistance in accessing mainstream benefits, including food stamps, childcare assistance, and health insurance, must be provided.

Minimum Performance Benchmarks for TH Projects

- 85% or more of all participants will exit to permanent housing
- 84% of participants will access mainstream resources (i.e. Cal-Fresh, Medi-Cal)

- 83% of participants will maintain or increase income from benefits, or employment or a combination of both
- 50% of participants will exit with employment

PERMANENT SUPPORTIVE HOUSING (PSH)

PSH is community-based housing with indefinite leasing or rental assistance paired with supportive services to help people with disabilities that are experiencing homelessness, especially chronic homelessness, achieve housing stability, live independently, and improve their overall quality of life.

Eligibility Criteria

- Participants must meet the HUD definition of homeless (Category 1, 2, or 4) and have a professionally diagnosed disability.

A person with disabilities means a household composed of one or more persons at least one of whom is an adult who has a disability. For HUD purposes, the disability must be confirmed by professional who is licensed to make that type of diagnosis. A detailed description is found in Appendix F.

Program Prioritization Requirements

- Follow CoC Priority Policy
- Follows CES Prioritization Guidelines (See Appendix C: CES Prioritization Guidelines)
- Priority must be given to chronic homeless households when vacancies occur

Targeted Populations

- Individuals and families who meet the eligibility criteria; and
- Priority is given to Individuals and families who meet HUD's definition of Chronically Homeless; and
- Have high needs with multiple barriers to housing; or
- Individuals with serious mental illness or substance use disorder; or
- Individuals or families identified as frequent users of high-cost systems through administrative data sources, including health care or criminal justice systems.

Program Standards

1. Promotes participant self-determination in selection of housing.

2. Use of assertive outreach/engagement strategies and housing stabilization case management with the understanding that participation in supportive services is not required.
3. Provides services that will promote the household increasing income levels, including employment as well as assisting the household apply for permanent disability benefits. Individualized budgeting and money management services are provided to program participants as needed.
4. Provides access to full-service wrap around services, including representative payee if needed.
5. Provides basic life skills information including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and information for obtaining vital documents (Social Security card, birth certificate, etc.).
6. Provides access to employment and educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education may be provided.
7. Promotes sobriety by utilizing a Harm Reduction approach to drug and alcohol treatment to help the participant with making decisions that lessen the negative impact of their drug and alcohol use on their housing stability, health, and general well-being.
8. Connects participants to community-based and mainstream resources, especially enrollment in a health care home to receive primary care services.
9. Participant contributions to housing costs do not exceed established local rent reasonableness or maximum allowed by funding source.
10. Households are expected to contribute 30% of the household's monthly-adjusted gross income to rent, if they have income. There is no minimum rent for households without income.
11. Provides tenant education and housing stability services or access to services by referral or through mainstream resources.
 - Provides individualized case management to program participants on a regular and consistent basis as determined by the individual's needs and goals. Case management services should be available either in the participant residence or readily accessible office setting.
12. Case management includes the following:
 - Comprehensively assessing the individual's needs and creating an individualized care coordination plan; working with the person to access services and supports in accordance with their care coordination plan, and reassessing the person's needs over time to adjust the care coordination plan and link them with ongoing services and supports to help them meet their goals.
 - Helping participants learn to live in housing, maintain their housing in a safe manner, get along with fellow tenants and the landlord.
 - Helping participants create support systems and participate in the community as they desire.

- Assisting participants in accessing necessary furniture or household items to meet habitability needs.
- Provides reevaluation of participant need at least annually.
- Assisting participants to find other appropriate permanent housing if they are no longer eligible for PSH.

Minimum Performance Benchmarks for PSH Projects

- 89% of participants will remain permanently housed for 12 months
- 80% of participants who exit program within 90 days will re-enter Permanent Housing within a particular time frame?
- 35% of participants without a source of reportable income at program entry will obtain cash benefits within what time frame?
- 84% of participants without a source of reportable income at program entry will obtain non-cash benefits within what time frame?

RAPID REHOUSING (RRH)

Description

RRH is a Housing First intervention designed to help individuals and families quickly exit homelessness, return to housing in the community, and maintain long-term housing stability. The core components of RRH includes housing identification, move-in and rental assistance, housing stabilization, case management, and services designed to increase household incomes to fully assume the cost of rent at program termination.

The following outlines the principles for each of the core components for providing RRH services. These principles are from the RRH Performance Benchmarks and Program Standards published in February 2016 by the National Alliance to End Homelessness (NAEH):

Housing Identification

- Within the limits of the participant’s income, a RRH program helps households access units that are desirable and sustainable—those that are in neighborhoods where they want to live, have access to transportation, are close to employment, and are safe.
- Assistance includes accompanying the participant to potential housing locations as determined by case plan.
- Housing identification efforts are designed and implemented to actively recruit and retain landlords and housing managers willing to rent to program participants who may otherwise fail to pass typical tenant screening criteria.
- Critical to the formation of landlord-program relationship is the recognition of the landlord as a vital partner. The RRH provider must be responsive to landlords to preserve and develop those partnerships for future housing placement.

Rent and Move-In Assistance

- Rent and move-in assistance should be flexible and tailored to the varying and changing needs of a household while providing the assistance necessary for households to move immediately out of homelessness and to stabilize in permanent housing.
- A RRH program should make efforts to maximize the number of households it can serve by providing households with the financial assistance in a progressive manner, providing only the assistance necessary to stabilize in permanent housing.
- The level of rental assistance and participant contribution to rent is described in an individualized case plan but do not exceed the limits established in the ESG Policies and Guidelines adopted by the RTFH.
- Assistance may include rental subsidy and deposits, move-in assistance, or housing supports as allowed by the assistance-funding source.
- The initial term of rental assistance for RRH is limited to no more than six (6) months and may be renewed for a maximum of 18 months based on case plan and participant need. It is expected that most participants will need 12 months or less of subsidy.
- The level of participant contribution to rent should increase during the program term so that the participants are paying 100% of rent by time of termination.

Case Management and Services

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

Eligibility Criteria

- Individuals and families must meet the HUD definition of literally homeless (Category 1), or fleeing Domestic Violence (Category 4).
- Households with income of 30% AMI or less is required for RRH assistance by ESG

Targeted Populations

- Individuals and families who meet the eligibility criteria; and
- Have mid-range acuity according to the Common Assessment Tool; or
- Households expected to regain housing independence in less than 18 months.

Priority Populations

- Follows IVCCC Priority Policy (See Appendix B: RTFH Prioritization Policy)
- Follows CES Prioritization Guidelines (See Appendix C: CES Prioritization Guidelines)
- Refers to NAEH Model Priorities (See Appendix D: NAEH RRH Program Standards)
- Families coming from the streets or ES

Program Standards

The IVCCC adopts the RRH program standards outlined in the RRH Performance Benchmarks and Program Standards published in February 2016 by the National Alliance to End Homelessness (NAEH). They include the core program components listed above and provide detailed standards for programs to operate by (see Appendix C.)

Determining Percentage of Rent Households Must Pay

The participant contribution to rent mirrors the ESG program guidelines. The goal of RRH is to have the household contributing to 100% of the rent at the time of termination of rental assistance. With this goal, the maximum amount of rent that a participant will pay will be up to 100% of the rental amount. Programs providing RRH assistance will use a progressive engagement model that will start with the household contributing at least 30% of their income to rent if receiving income. This will steadily increase in incremental monthly steps over the course of the program with the household ultimately paying 100% of the rent and program termination. 100% of the cost of rent in rental assistance may be provided to program participants at initial program entry; however, to maximize the number of households that can be served with RRH services, it is expected that the level of subsidy will be based on the goal of providing only what is necessary for each household to be stably housed for the long term. RRH case managers should work with participants receiving assistance to develop a plan whereby rental subsidies will decrease as the participant prepares to become self-sufficient from the rental assistance. Rental assistance can only be provided for a unit that meets funding source criteria.

Minimum Performance Benchmarks for RRH Projects

- 89% of households will exit to permanent destinations
- 80% of households exiting to permanent destinations will remain in permanent housing at 3 and 6 month follow-up
- 60% of households will not return to homelessness in the following 12 months

- 88% of households will maintain or increase income within what time frame?
- 50% of households served will move into housing within 30 days of RRH referral to agency
- The remaining 50% of households served will move into housing within 90 days of RRH referral to the agency

Appendix A. HUD Homeless Definition Categories

The following Homeless Definition Categories can be found in the HUD Federal Register Volume 76, No. 233, dated Monday, December 5, 2011, under Rules and Regulations.

Category 1: Literally Homeless

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

1. Has a primary nighttime residence that is a public or private place not meant for human habitation;
2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
3. Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness

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

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

Category 3: Homeless Under other Federal Statutes¹¹

Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:

1. Are defined as homeless under the other listed federal statutes;
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
3. Have experienced persistent instability as measured by two moves or more in the preceding 60 days; and

4. Can be expected to continue in such status for an extended period due to special needs or barriers.

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

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

Appendix B. Imperial County's CoC Prioritization Policy

The CoC Board adopted policy priorities which incorporate Community Planning and Development (CPD) bulletin #14-012: *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in PSH*, issued July 28, 2014. The priorities were updated in 2016 to mirror CPD #16-011 and further define 'most needs' to include persons with serious mental illness or substance use disorder.

Specifically, the IVCCC Executive Board has announced the 2019 funding priorities:

Homeless Population Priorities

1. Veterans & Single men
 - a. Chronically homeless longest homeless & greatest needs *
 - b. DV/ trafficking victims
2. Youth
 - a. TAY
 - b. LGBTQ
 - c. DV/ trafficking victims
3. Families
 - a. DV/trafficking victims
 - b. Chronically homeless longest homeless & greatest needs *

Service Priorities

1. Permanent housing: Rapid rehousing and Permanent Supportive Housing
2. Support Services only: HMIS, CES
3. Emergency Shelters
4. Transitional Housing

*Chronically homeless individuals, youth and families:

- a. Those with the longest history of experiencing homelessness and the most needs
- b. Those with the longest history of experiencing homelessness
- c. Those with the most needs, particularly mental illness or substance use disorder
- d. All other: Non-Chronically homeless individuals, youth and families

Appendix C. CES Prioritization Guidelines

Documentation of Priority Status						
	Priority	Homeless Category	Length of Stay in Homelessness	Where Experience Homelessness	Severity of Service Needs	Documented Disability
Permanent Supportive Housing	1	Category 1 - Chronically Homeless Individual or Family	> 12 months continuous OR Total of at least 4 episodes totaling >12 months	Unsheltered, Emergency Shelter, Safe Haven	High = VI-SPDAT 2 score of 8 or higher for singles and 9 or higher for families AND/OR Documented frequent user of health or criminal	Yes
	2	Category 1 - Chronically Homeless Individual or Family	> 12 months continuous OR Total of at least 4 episodes totaling >12 months	Unsheltered, Emergency Shelter, Safe Haven	Low = VI-SPDAT Score of less than 8 for individuals and less than 9 for families	Yes
	3	Category 1 - Chronically Homeless Individual or Family	Total of at least 4 episodes total <12 months in 3 years	Unsheltered, Emergency Shelter, Safe Haven	High = VI-SPDAT 2 score of 8 or higher for singles and 9 or higher for families AND/OR Documented frequent user of health or criminal	Yes
	4	Category 1 - Chronically Homeless Individual or Family	Total of at least 4 episodes total <12 months in 3	Unsheltered, Emergency Shelter, Safe Haven	Low = VI-SPDAT Score of less than 8 for individuals and less than 9 for families	Yes
Transitional Housing	1	Category 1 or 4 Family and one of CoC TH target populations	Length of Stay > 14 days	Unsheltered, Emergency Shelter, Safe Haven	Mid= VI-SPDAT Score between 4-8 of for individuals and between 4-9 for families	Not required
	2	Category 1 or 4 Individual and one of CoC TH target populations	Length of Stay > 14 days	Unsheltered, Emergency Shelter, Safe Haven	Mid = VI-SPDAT Score between 4-8 of for individuals and between 4-9 for families	Not required
Rapid Re-Housing	1	Category 1 or	Length of Stay > 14 days	Unsheltered, Emergency Shelter, Safe Haven	Mid = VI-SPDAT Score between 4-8 of for individuals and between 4-9 for families	Not required
	2	Category 1 or Category Individual	Length of Stay > 14 days	Unsheltered, Emergency Shelter, Safe Haven	Mid = VI-SPDAT Score between 4-8 of for individuals and between 4-9 for families	Not required
Emergency Shelter	1	Category 1, 2, 3, or 4 Family	Any Length of Stay	Any	Low = VI-SPDAT Score 3 or less for individuals and families or awaiting placement in PSH, TH, or RRH	Not required
	2	Category 1, 2, 3, or 4 Individual	Any Length of Stay	Any	Low = VI-SPDAT Score 3 or less for individuals and families or awaiting placement in PSH, TH, or RRH	Not required
Homeless Prevention	NA	Category 2 Individual or Family	Primary nighttime residence will be lost within 14 days	Meet Category 2	Past episode of homelessness	Not required
	NA	Category 2 Individual or Family	Primary nighttime residence will be lost within 14 days	Meet Category 2	No prior homeless episodes	Not required
	NA	Category 2 Individual or Family	Meet Category 2	Meet Category 2	NA	Not required

Appendix D. NAEH RRH Program Standards

The following program standards are from the Core Component Program Standards section in the RRH Performance Benchmarks and Program Standards published in February 2016 by the National Alliance to End Homelessness (NAEH).

Housing Identification Program Standards

Program Staffing

- Program designates staff whose responsibility is to identify and recruit landlords and encourages them to rent to homeless households served by the program. Staff has the knowledge, skills, and agency resources to understand landlord's perspectives, understand landlord and tenant rights and responsibilities, and negotiate landlord support. A program may have dedicated staff for which this is the primary responsibility. If a program does not have a dedicated staff person(s) who performs this function, case manager job descriptions must include responsibilities including landlord recruitment and negotiation and at least some of the program's case managers must be trained in this specialized skill set to perform the recruitment function effectively.
- Staff is trained on housing identification, landlord tenant rights and responsibilities, and other core competencies as well as the wider array of housing assistance available within a community. Program has routine ways to onboard new staff and to keep staff regularly updated on new strategies, policies, and housing assistance options in the community.

Program Policies

- Program has written policies and procedures for landlord recruitment activities, including screening out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices.
- Program offers a standard, basic level of support to all landlords who lease to program participants. This support is detailed in a written policy distributed to landlords. Program can negotiate additional supports, as needed, on a case-by-case basis. At a minimum, this policy specifies that program staff:
- Respond quickly (within one business day) to landlord calls about serious tenancy problems;
- Seek to resolving conflicts around lease requirements, complaints by other tenants, and timely rent payments; and
- Whenever possible, negotiate move-out terms and assist the person/household to quickly locate and move into another unit without an eviction
- Program has a detailed policy for the type of assistance provided to help households find and secure housing. Staff explains and distributes this policy to households at entry to the

program. Some households may decline assistance in finding housing, but the program checks on their progress and offers advice and/or direct assistance if they encounter obstacles they cannot resolve independently.

- Program has a written policy requiring staff to explain to participant's basic landlord-tenant rights and responsibilities and the requirements of their specific lease.

Program Activities

- Program continually engages in the recruitment and retention of landlord partners and has methods of tracking landlord partners and unit vacancies, unit locations, characteristics, and costs.
- Program provides participants with multiple housing choices within practical constraints. The onus is on the program to provide these housing choices, but this does not preclude program participants from conducting their own search and choosing housing they identify independently.
- Program assists participants in making an informed housing choice with the goal that the participant will be able to maintain after program exit, even when the household will experience high housing cost burden. While, participants ultimately chose their housing unit, a program uses housing and budgeting plans that help a participant understand the likelihood of being able to pay rent and meet the requirements of the lease by the end of assistance. For extremely low income households, there should be reasonable projections and expectations and due diligence on the program's part to help participants secure income (through employment, public benefits, and/or on-going rental assistance) at program exit
- When closing a case, program provides information to landlords about how they can contact the program again if needed and what kind of follow-up assistance may be available.

Rent and Move-In Assistance

Program Staffing

- Program staff are trained on regulatory requirements of all RRH funding streams and on the ethical use and application of a program's financial assistance policies, including, but not limited to initial and ongoing eligibility criteria, program requirements, and assistance maximums. Program has a routine way to onboard new staff and to keep staff regularly updated on changing regulations and/or program policies.

Program Policies

- Program has clearly defined policies and procedures for determining the amount of financial assistance provided to a participant, as well as defined and objective standards for

when case management and financial assistance should continue and end. Guidelines are flexible enough to respond to the varied and changing needs of program participants, including participants with zero income.

- If participants are expected to pay an amount toward their housing, program has written policy and procedures for determining that amount, and it must be an amount that is reasonable for their income (this could be up to 50-60 percent of income), including \$0 for those with no current income.
- A progressive approach is used to determine the duration and amount of rent assistance. Financial assistance is not a standard “package” and is flexible enough to adjust to households’ unique needs and resources, especially as participants’ financial circumstances or housing costs change. Policies detailing this progressive approach include clear and fair decision guidelines and processes for reassessment for the continuation and amount of financial assistance. Policies and procedures also detail when and how RRH assistance is used as a bridge to a permanent subsidy or PSH placement.

Program Activities

- Program provides when needed—either directly or through formal agreement with another organization or agency—financial assistance for housing costs, which may include rental deposits, first month’s rent, last month’s rent, temporary rental assistance, and/or utility assistance.
- Program issues checks quickly and on time and has the capacity to track payments to landlords and other vendors.
- Program has the capacity to pay reasonable back rent and utility arrears that directly prevent a participant from being able to sign a lease.
- Program helps participants meet basic needs at move-in, such as securing basic furnishings for an apartment, including mattresses and basic kitchen items such as a pot for cooking and utensils.
- The transition off financial assistance is coordinated with case management efforts to assist program participants to assume and sustain their housing costs

Program Standards

Program Staffing

- Case manager's job descriptions direct case managers to focus on housing and to use strengths- based practices focused on participant engagement and meeting the unique needs of each household.
- In programs that have specialized staff that conduct housing location case manager's work closely with housing locator staff to match the participant to an appropriate unit as quickly as possible.
- Case managers are trained on RRH case management strategies and related evidence- based practices as well as program policies and community resources. Additionally, a program has a regular process for onboarding new staff and regularly updating the training of current staff.

Program Policies

- Except where dictated by the funder, program participants direct when, where, and how often case management meetings occur. Meetings occur in a participant's home and/or in a location of the participant's choosing whenever possible.
- Case managers respect a program participant's home as their own, scheduling appointments ahead of time, only entering when invited in, and respecting the program participant's personal property and wishes while in their home.
- When case management and service compliance is not mandated by federal or state regulation, services offered by a program have voluntary participation.
- Program has clear safety procedures for home visits that staff is trained on and that are posted clearly visible in office space and shared with program participants at intake, and shared with participants and staff whenever changes are made.
- Program has clearly defined relationships with employment and income programs that it can connect program participants to when appropriate.
- Program has clearly defined policies and objective standards for when case management should continue and end. These guidelines are flexible enough to respond to the varied and changing needs of program participants. In instances where cases are continued outside of these defined policies and objective standards, there is a review and approval process.

Program Activities

Program activities for RRH case management are grouped into categories that will contribute to the specific goals of RRH case management. The program activities listed here are not

exclusively provided in a linear progression and can be administered in whatever order and intensity is most appropriate for a participant.

Obtain and Move into Permanent Housing

- At enrollment or within 72 hours of enrollment, program conducts a tenancy barriers assessment— not for screening out a participant, but to quickly address any such barriers, help direct and navigate the housing search and contribute to landlord negotiation efforts. Any other assessments completed prior to housing are limited and focus on those things necessary to support health and safety and resolve the housing crisis as quickly as possible.
- Program has resources and/or can connect participants to community resources that help participants: resolve or navigate tenant problems (like rental and utility arrears or multiple evictions) that landlords may screen for on rental applications; obtain necessary documentation such as identification; prepare participants for successful tenancy by reviewing lease provisions; and support other move-in activities such as providing furniture.
- Program offers basic tenancy skills learning opportunities which can include instruction or guidance on basic landlord-tenant rights and responsibilities, requirements and prohibitions of a lease, and meeting minimum expectations for care of the housing unit, such as not causing damage

Support Stabilization in Housing

- Program staff works directly with the participant and landlord to resolve tenancy issues without threatening the participant's tenancy. The issue might be failure to pay rent, not properly maintaining the unit, or disturbing the quiet enjoyment of others. It also may include a landlord not meeting his/her obligations. Program works quickly to identify a corrective course of action, and, without breaking a participant's confidentiality, keep the landlord and participant informed about the program's action to mitigate the situation.
- When appropriate, case managers work with participants to build their communication skills to better respond to or negotiate with a landlord. This might relate to repairs; an extension on a rent payment; or complaints against the tenant concerning noise, odors, trash, or the behavior of children or participants, for example.
- When necessary, case managers help participants avoid evictions before they happen, and maintain a positive relationship with the landlord. This can be done by moving a household into a different unit prior to eviction and possibly identifying a new tenant household for the landlord's unit.
- Housing plans, sometimes known as case plans or goal plans, focus on how program participants can maintain a lease and address barriers to housing retention, including maximizing their ability to pay rent; improving understanding of landlord/tenant rights and responsibilities; and addressing other issues that have, in the past, resulted in housing crisis or housing loss. Plans account for participant preferences/choices, and include only goals created with and agreed to by the participant.

- Program, at a minimum, maintains a list of community resources (and their eligibility requirements) to which participants can be referred. Preferably, program has relationships with these agencies. The list is regularly updated, and includes other low-income housing assistance programs.
- Case managers make referrals to appropriate community and mainstream resources, including, but not limited to income supplements/benefits (TANF, Food Stamps/SNAP, etc.), non-cash supports (healthcare, food supports, etc.), legal assistance, credit counseling, and subsidized childcare. When making these referrals, it is the case manager’s responsibility to follow-up on receipt of assistance. However, a participant may choose not to follow up on or participate in any referred services or programs.
- As RRH assistance is short-term, case managers pay attention to participants’ incomes moving forward. Though income is not a requirement at the beginning of a program, case manager’s help participants review their budgets, including income and spending, to make decisions about reducing expenses and increasing income. Options include benefit enrollment and increasing employment and earnings over time.
- Case manager’s work with participants to identify pathways for increasing earned income; including participating in mainstream and community employment support programs as well as using a program’s own employer connections.
- If necessary, participants are assisted in identifying existing familial and personal connections that can help them maintain housing by providing supports such as child care, transportation, etc. Participants may choose not to engage in this process.

Close the Case

- When closing a case, case managers are responsible for ensuring that all appropriate referrals have been made and information on available community assistance has been shared with a participant.
- When a referral to on-going supports is made while a case is open or in the process of closing, case managers provide a “warm handoff” and follow up, to assure that assistance is satisfactory.

When closing a case, case managers provide information to participants about how they can access assistance from the program again if needed and what kind of follow-up assistance may be available. In instances when a participant is at imminent risk of returning to homelessness, program has the capacity to either directly intervene or provide referral to another prevention resource.

Appendix E. Definition of Chronically Homeless

24 CFR §578.3 HUD Chronically Homeless Definition

A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, if the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, if the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility.
- An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all the criteria in paragraph (1) of this definition, before entering that facility; or
- A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Appendix F. Definition of Disability

'Person with disabilities' means a household composed of one or more persons at least one of whom is an adult who has a disability.

(1) A person shall be considered to have a disability if he or she has a disability that:

- a. Is expected to be long-continuing or of indefinite duration;
- b. Substantially impedes the individual's ability to live independently;
- c. Could be improved by the provision of more suitable housing conditions; and
- d. Is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.

(2) A person will also be considered to have a disability if he or she has a developmental disability, as defined in this section.

(3) A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).

(4) Notwithstanding the preceding provisions of this definition, the term person with disabilities includes, except in the case of the SRO component, two or more persons with disabilities living together, one or more such persons living with another person who is determined to be important to their care or well-being, and the surviving member or members of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death. (In any event, with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.)

https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

Appendix G. List of Acronyms

CES – Coordinated Assessment and Housing Placement system

CE – Coordinated Entry

CoC – Continuum of Care

CoC Program – Continuum of Care Competitive Program- funded by HUD

ES – Emergency Shelter

ESG – Emergency Solutions Grant – direct entitlements funded by HUD

ESG – State – ESG funds awarded to California Department of Housing and Community Development for use in non-entitlement areas

HMIS – Homeless Management Information System

HUD – U.S. Department of Housing and Urban Development

PSH – Permanent Supportive Housing

RRH – Rapid Re-housing

TH – Transitional Housing

VA – Department of Veterans Affairs

VI-SPDAT – Vulnerability Index-Service Prioritization Decision Assistance Tool

VI-F-SPDAT – Vulnerability Index-Family Service Prioritization Decision Assistance Tool

Appendix H. Reviewing and Prioritizing Projects for Funding

General Procedure

HUD CoC Funds are granted based on a national competition following the Notice of Funding Availability (NOFA). Immediately upon HUD's Continuum of Care NOFA release, the CoC coordinates the following process:

- The IVCCC Board considers community priorities, identifies or designs scoring tools based on HUD mandates and NOFA guidelines.
- IVCCC identifies and 'seats' a rating and ranking committee
- Information regarding the NOFA and the community's process and requirements are disseminated to all CoC and other interested parties (all homeless service and housing providers in the continuum of care area) via the following open solicitation methods
 - Posting on COCIV.org website
 - Announcements at CoC meetings
 - Announcements at other community meetings
 - Published in newspaper
- Agencies interested in applying for funds will be required to complete a Intent to Apply form to be submitted by the posted due date
- Applications and additional information is collected and reviewed according to procedures described below
- IVCCC Board or its designee (Rating & Ranking Committee or other) determine that application thresholds are met
- The Rating & Ranking Committee is created according to procedures described below
- Final project applications are included in the COC electronic application and submitted to HUD by the Collaborative Applicant.

Funding Priorities and Local Need

Services and housing for homeless are needed in all aspects within our community, however, there are specific populations that are of greatest need and will be a funding priority for the CoC. Creating funding priorities is driven by the community's needs assessment and gaps analysis. All organizations in the CoC that participate in the gaps analysis process have a voice in determining the community's priorities for funding. Funding priorities are established through a fair and open process using objective criteria. (Please see the Gaps Analysis/ Needs Assessment Policy for more details.)

Through this gaps analysis process, the following areas have been identified as funding priorities:

- Permanent Supportive Housing serving all target populations
- Renewals of successful operating projects are a priority to remain funded if the need for the project still exists in the community
 - The CoC will review each project at the time it seeks renewal funding to determine if the project is performing satisfactorily and is meeting the needs of persons it proposed to serve or whether local needs have changed and other subpopulations or types of assistance should be given preference

- To maximize the funds available to new projects, renewal projects may apply for only one year

of funding

- Remaining funds (after the funding of successful one-year renewals) from the HUD designated Pro Rata amount for our CoC are available through the competitive application process

Bidders' Conference

A Bidders' Conference will be conducted for anyone interested in learning more about the NOFA as well as for those agencies submitting applications. The Bidders' Conference will include the following issues:

- Eligible activities
- Eligible persons to be served
- Amounts available
- Match requirements
- Timelines and deadlines
- Local community process

Procedures for Application Submissions

- Proposals must be submitted via e-snaps by the identified due date
- A PDF version of the application and all additional requested information must be emailed to the CoC as described below in Evaluation Committee process
- Specifics regarding due dates, submission requirements, and proposal format will be distributed and reviewed at a COC Bidder's Conference

Late and Incomplete Applications Policy

- Late Intent to Apply forms will not be accepted
- Late Application: late applications received within 48 hours of the due date/time will receive a 15 point score reduction; late applications received after 48 hours will not be accepted
- Incomplete Applications: incomplete applications cannot be cured for Rating & Ranking Committee scoring, but must be corrected prior to HUD submission; the original application (not the copies) will be examined to determine if all pieces of the application have been submitted

Using All Available Funds

The CoC will do everything possible to ensure that all funds possibly available to the community are applied for. Thus, when all on-time applications have been submitted and it appears that either 1) the community is not requesting as much money as is available from HUD or 2) no Samaritan Housing Initiative projects have been submitted, then:

- The CoC staff will email all CoC and other interested parties (all homeless service and housing providers in the continuum of care area) with specifics regarding:
 - How much money is available
 - For what type of programs
- Any additional applications for these funds will be due one week after this email is distributed

Rating & Ranking Committee Policies

- I. All Applications must be received in hard copy by the posted due date.
- II. Threshold review: Applications will be reviewed for completeness. Those that are incomplete (i.e. missing forms/ documents required by funder and/or COC) will not be considered.
- III. The IVCCC's Evaluation Committee will determine the priority and ranking of all submitted projects application for HUD COC applicant priority listing in Tier 1 and Tier 2.
 - A. Included applications will be one of the following type of projects, as required by HUD:
 - Rapid Rehousing or Permanent Housing
 - Supportive Services Only (i.e. Coordinated Entry system)
 - HMIS
 - Shelters (ESG only)
 - Transitional housing
 - B. Additionally acceptable are transitional **housing** projects for three priority groups:
 - Veterans
 - Men
 - Homeless youth
 - Families and Victims of domestic violence
- IV. Scoring tools are created by the COC 's Administrative Entity who has the task of advising and coaching the Evaluation Committee in its work of reviewing & ranking based on HUD mandates as discussed in the HUD Continuum of Care Program Competition 2017 , FR-6100-N-25
- V. The Evaluation Committee members will review the following objective rating measures to assess the **performance** of projects seeking funding:
 - HUD and/or COC monitoring findings
 - Independent audits
 - HUD APRs for performance results
 - Unexecuted grants
 - Expenditure of grant funds (fast or slow)
 - Cost effectiveness of the project
 - Provider organization experience ; provider organization capacity
 - CoC membership involvement
 - HMIS participation involvement
 - Match funds committed to project
 - Other priorities, to be determined, based on NOFA priorities
- VI. Additional factors to consider in determining IVHTF application priorities are HUD's 2016 Policy Priorities listed below. These priorities were unanimously accepted by the IVHTF on July 28, 2016. HUD funded projects must address one or more of these policies and will earn scoring points for doing so, affecting the tier 1 and tier 2 ranking
 1. Create Systematic Response to Homelessness
 - a) Measure system performance
 - b) Create an effective Coordinated Entry process
 - c) Promote participant choice
 - d) Plan as a system

- e) Make delivery of homeless assistance more open, inclusive, transparent
- 2. Strategically Allocate Resources
 - a) Comprehensively review project quality, performance and cost effectiveness
 - b) Maximize use of mainstream & other community- based resources
 - c) Review transitional housing projects
- 3. End Chronic Homelessness
 - a) Target persons with highest need /longest histories for homelessness
 - b) Increase units
 - c) Improve outreach
- 4. End Family Homelessness
- 5. End Youth homelessness
- 6. End Veteran homelessness
- 7. Use a Housing First Approach
 - a) Use data to quickly & stably house homeless persons
 - b) Engage landlords and property owners
 - c) Remove barriers to entry
 - d) Adopt client –centered service models

The Rating & Ranking Committee

- I. The CoC recruits annually The Rating & Ranking Committee members who are knowledgeable about homelessness and housing in the area and who are broadly representative of the relevant sectors, subpopulations, and geographic areas.
- II. The Rating & Ranking Committee members will be composed of representatives from a cross-section of groups and housing; housing developers; city representatives; Imperial County employees; business, non-profit sector, law enforcement.
 - A. Members will be appointed every year, their eligibility verified by the IVCCC Executive Board
 - B. The Rating & Ranking Committee members must sign a statement declaring that they have no conflict of interest, and a confidentiality agreement.
 - C. An Rating & Ranking Committee member may not be an employee, volunteer, family member, advisor or serve on a governing body of an applicant agency, currently or within the past 3 years.
 - D. Members must be able to dedicate time for application review and committee meetings as directed by the Executive Board or their designee
 - E. The Rating & Ranking Committee members (minimum of 3, maximum of 7) are trained in the following:
 - 1. information regarding homeless activities, needs, services, definitions and other issues that are pertinent to the CoC
 - 2. A background of COC Competition
 - 3. The role of The Rating & Ranking Committee
 - 4. Review of the scoring tools, applications, and resources

Process

- 1. The Rating & Ranking Committee members receive eligible applications and scoring materials
- 2. The Rating & Ranking Committee reviews all applications over a one-week period.
- 3. The Rating & Ranking Committee meets to review and discuss each application together and to

- individually score them.
4. An IVCCC Executive Special Board meeting will be scheduled where the CoC Administrative entity presents the information at the meeting to record and approve final decisions and any comments/ recommendations the Committee has for applicants.
 - a. The Committee determines the rank and funding levels of all projects considering all available information
 - b. Overall raw scores are calculated by the Committee and verified by the Consultant
 - c. The Committee may consider adjustment- recommendations to applicants in order to maximize the COC's funding request and to sufficiently meet the HUD priorities
 - d. The Committee considers proposal changes or project budget adjustments that may be required to meet community needs and funding limits
 - e. During deliberation, the CoC Consultant will provide technical assistance by responding to questions of the Committee, correcting technical inaccuracies if they arise.
 5. Scoring results are posted on CoCIV.org website to applicants with a reminder about the appellate process.
 - a. Applications which do not meet the threshold requirements will not be included in the Priority List
 - b. If more applications are submitted than the CoC has money to fund, the lower scoring applications will be included in Tier 2

Policy for Appeals of the Rating & Ranking Committee

1. An Appeal Committee will be appointed by COC Governance. It will consist of two (2) to three (3) members who may not be members of the Rating & Ranking Committee. This will be an ad hoc committee
2. Applicants may appeal if the applicant can prove the score is not reflective of the application information provided, if a scoring factor was missed or omitted.
3. Ineligible Appeals
 - Applicants that have been found not to meet the threshold requirements are not eligible for an appeal
 - Appeals cannot be based upon the judgment of The Rating & Ranking Committee
 - Applicants may not attempt to assert influence or pressure on Appeal Committee
4. All notices of appeal must be based on the information submitted by the application due date.
5. No new or additional information will be considered. Omissions to the application cannot be appealed. **The decision of the Appeal Committee will be final.**
 - An applicant may not challenge, cajole, or question individual committee members about the Committee process or decisions made in an effort to justify the value of the project that was not selected for funding

The Appeal Process

1. Any and all appeals must be received in writing within three (3) business days of the notification

- of project ranking, to be posted on COCIV.org webpage
2. A notice of appeal must be submitted to IVCCC Board Chair by within 48 hours of the notification of project priorities on the COC IV website. An email submission is acceptable.
 3. The notice of appeal must include a written statement specifying in detail the grounds asserted for the appeal, must be signed by an individual authorized to represent the sponsor agency (i.e., Executive Director)
 4. The notice of appeal is limited to double-spaced page in 12-point font
 5. The appeal must include a copy of the application and all accompanying materials submitted to The rating & Ranking Committee; no additional information can be submitted
 6. All valid appeals will be read, reviewed and evaluated by the appointed Appeal Committee.
 - a. All applicants will be invited to attend any appeal and may make a 10-minute statement regarding the appeal
 - b. The Appeal Committee will review the rankings made by The Rating & Ranking Committee only on the basis of the submitted project application, the one page appeal, any statements made during the appeal process, and the material used by The Rating & Ranking Committee members Committee; no new information can be submitted by the applicant or reviewed by the Appeal Committee
 - a. The decision of the appeal process committee must be supported by a simple majority vote
 7. The appealing agency will receive, in writing, the decision of the Appeal Committee within 2 business days of the Appeal Committee Meeting; the decision of the Appeal Committee will be final.

Final Prioritized List of Applications

The final prioritized list of proposals must be approved by the IVCCC Executive Board. Any board members with a conflict of interest (e.g. employed by an applicant agency) must abstain from the vote approving the priority list. This list will be forwarded to HUD; individual applications and supporting documentation, signature pages, and required attachments must be incorporated into the final 'Exhibit 1' of the Continuum of Care application. Funding is typically based upon the prioritized list of applicants who were submitted, however, actual awards/award amounts are determined by HUD.

If there is not a quorum in the IVCCC Executive Board due to abstentions, the final approval will be turned over to the general membership of the CoC. This vote can either take place at a regularly scheduled membership meeting if time permits, or can take place electronically through email to the membership.