



**WESTERN PA CONTINUUM OF CARE (PA-601)
WRITTEN STANDARDS FOR PROVIDING ASSISTANCE**
Approved by Western PA CoC Governing Board, 3/30/2021

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Introduction & Background

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

- Establish community-wide expectations for the operations of projects within the CoC,
- Ensure that the system is transparent to service users and providers,
- Create consistency and coordination among projects, and
- Further the CoC's ability to meet system-wide goals

This document provides the following:

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

The written standards were developed based on the recommendations and feedback of the CoC's Governing Board, ad hoc Written Standards Committee, Coordinated Entry (CE) Committee, NW Housing Collaborative, SW Regional Homeless Advisory Board (RHAB) and general CoC membership. Best practices as shared by the National Association to End Homelessness (NAEH), US Department of Housing and Urban Development (HUD), and US Interagency Council on Homelessness (USICH) were also referenced. Several of these best practices are hyperlinked throughout the document for the reader's reference. Moreover, example templates are mentioned throughout the document and are located in the Appendices to aid in standardizing processes; however, use of these specific templates are also voluntary (unless a recipient requires subrecipients to use any templates for a more streamlined program implementation).

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

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

Projects are expected to adhere to all additional Project requirements within the HUD regulations (24 CFR Part 578¹ for CoC funded and 24 CFR Part 576² for ESG funded), as well as new requirements mandated by HUD and the Western PA Continuum of Care.

Lastly, both the CoC and ESG Interim Rules identify specific requirements for Written Standards for Projects that utilize these funds. See **Appendix A for HUD's requirements for the Written Standards.**

¹ <https://www.law.cornell.edu/cfr/text/24/part-578>

² <https://www.law.cornell.edu/cfr/text/24/part-576>



GENERAL STANDARDS FOR ALL PROJECTS

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

APPLICATIONS CoC projects should submit an annual application for project funding to the CoC, in compliance with the CoC’s timeline, for submission to HUD. ESG projects are non-renewable and should submit applications for project funding according to DCED’s application process.

CONFLICT OF INTEREST CoC-funded projects must follow 24 CFR 578.95³. ESG projects are expected to follow the conflict of interest standards outlined in 24 CFR 576.404⁴ related to the provision of ESG assistance, and procurement of goods and services.

CE PARTICIPATION All CoC-funded TH, RRH, and PSH Projects; and ESG-funded RRH Projects are required to only accept referrals and fill vacancies and/or turnover units using the CE Housing By-Name List (BNL). Projects must follow the Order of Priority within CoC’s Geographic Area. The CE Policy and Procedures can be found at: <https://pennsylvaniacoc.org/balance-staterwestern-pa-coc/western-pa-coc-coordinated-entry-committee>.

CO C PARTICIPATION All recipients are expected to participate in semi-annual CoC-wide meetings, RHAB/Collaborative meetings and required CoC trainings. CoC-funded programs should also participate in CoC subcommittees and/or ad hoc workgroups as appropriate. ESG-funded programs are encouraged to participate in any of the above as well.

DIVERSION All Projects, especially CE and ES staff, should explore all options prior to enrolling a household into the homeless system. This can include strengths-based problem-solving conversations, identifying community supports, and offering lighter touch solutions.

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

ENROLLMENT Project enrollment should be based on eligibility and CE prioritization, **not other factors such as residency**. See “Prioritization” in this section for information on prioritization.

³ <https://www.law.cornell.edu/cfr/text/24/578.95>

⁴ <https://www.law.cornell.edu/cfr/text/24/576.404>



ENVIRONMENTAL REVIEW All CoC-funded projects (unless exempt) are required to complete an environmental review per 24 CFR 578.31⁵. However, per 24 CFR 576.407(d)⁶, ESG activities will require some level of environmental review & clearance. No funds may be expended until an environmental review that meets the standards outlined in 24 CFR 58⁷ has been submitted and approved by PA Department of Community and Economic (DCED).

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

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

⁵ <https://www.law.cornell.edu/cfr/text/24/578.31>

⁶ <https://www.law.cornell.edu/cfr/text/24/576.407>

⁷ <https://www.hudexchange.info/resource/167/environmental-review-procedures-24-cfr-58/>



[for additional details, see 24 CFR 5.109(e)(g)⁸ for CoC-funded and 24 CFR 576.406⁹ for ESG funded]

FAIR HOUSING AND EQUAL ACCESS Projects must make known that use of the facilities and services are available to all on a nondiscriminatory basis, in a manner that furthers fair housing in accordance with Fair Housing and Equal Opportunity laws and regulations. Each Project needs to address their state, local and municipality requirements regarding fair housing rules and regulation.

See Appendix B for CoC Non-Discrimination and Affirmative Fair Housing Policy.

Projects must also follow:

- **Equal Access in Accordance with Gender Identity Final Rule (2016)**¹⁰
- **Equal Access to Housing Final Rule (2012)**¹¹
- **HUD Notice CPD-15-02: Appropriate Placement for Transgender Persons in Single-Sex ES and Other Facilities**, which provides guidance to Emergency Solutions Grants (ESG), Continuum of Care (CoC), and Housing Opportunities for Persons With AIDS (HOPWA) funded providers on how best to provide shelter to transgender persons in a single-sex facility and on appropriate and inappropriate inquiries related to a potential client's sex for the purposes of placing transgender persons in temporary, ES, or other facilities with shared sleeping areas or bathrooms.
- **Violence Against Women Act (2013)** -- Applies for all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation, and which must be applied consistent with all nondiscrimination and fair housing requirements.
- **Fair Housing and Equal Opportunity-** In accordance with 24 CFR 578.93¹², projects must follow nondiscrimination and equal opportunity requirements as well as those requirements set forth in 24 CFR 5.105(a)¹³.
 - **Affirmative Outreach.** 24 CFR 578.93(c)¹⁴ for CoC-funded and 24 CFR 576.407(b)¹⁵ for ESG-funded requires that projects must affirmatively market housing and supportive services to eligible persons--regardless of race, color, national origin, religion, sex, age, familial status, or handicap--who are least likely to apply in the absence of special outreach, and maintain records of those

⁸ <https://www.law.cornell.edu/cfr/text/24/5.109>

⁹ <https://www.law.cornell.edu/cfr/text/24/576.406>

¹⁰ <https://www.hudexchange.info/resources/documents/Equal-Access-Final-Rule-2016.pdf>

¹¹ https://www.hudexchange.info/resources/documents/EqualAccess_FinalRule_2.3.12.pdf

¹² <https://www.law.cornell.edu/cfr/text/24/578.93>

¹³ <https://www.law.cornell.edu/cfr/text/24/5.105>

¹⁴ <https://www.law.cornell.edu/cfr/text/24/578.93>

¹⁵ <https://www.law.cornell.edu/cfr/text/24/576.407>



marketing activities. To ensure the CE process assists CoC Project and ESG Project recipients in meeting the Affirmatively Furthering Fair Housing requirement, Western PA CoC is committed to providing marketing resources, auxiliary aids and other services necessary to ensure effective communication with persons accessing the homeless response system, which includes ensuring that information is provided in appropriate accessible formats as needed, such as Braille, audio, large type, assistive listening devices, and sign language interpreters, as well as accommodation for persons with limited English proficiency. Resources will be developed and made available by the CoC designated Lead Agency and marketing plans described within the CE Policy and Procedure Manual. Housing assisted by HUD and made available through the CoC must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2).

- A recipient must implement its Projects in a manner that affirmatively furthers fair housing, which means that the recipient must:
 - Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;
 - Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective Project participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and
 - Provide Project participants with information on rights and remedies available under applicable federal, State, and local fair housing and civil rights laws.
- **Accessibility and integrative housing and services for persons with disabilities.** Recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR 100¹⁶), Section 504 of the Rehabilitation Act of 1973 (24 CFR 8¹⁷), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR 35¹⁸ and 36¹⁹). In accordance with the requirements of 24 CFR 8.4(d)²⁰, recipients must ensure that their Project's housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.

¹⁶ <https://www.law.cornell.edu/cfr/text/24/part-100>

¹⁷ <https://www.law.cornell.edu/cfr/text/24/part-8>

¹⁸ <https://www.law.cornell.edu/cfr/text/28/part-35>

¹⁹ <https://www.law.cornell.edu/cfr/text/28/part-36>

²⁰ <https://www.law.cornell.edu/cfr/text/24/8.4>



- **Reasonable Accommodations and Modifications for Persons with Disabilities²¹.** Persons with disabilities may be entitled to reasonable accommodation and/or modifications. A request for reasonable accommodation must be made by or on behalf of a person with a disability. The request must be necessary i.e., there must be a disability-related need for the reasonable accommodation or modification. In addition, the request must be reasonable. i.e., cannot impose an undue financial and administrative burden on the housing provider or fundamentally alter the nature of the provider's operations. The Act makes it unlawful to refuse to make reasonable accommodations to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling. The Act also makes it unlawful for a housing provider or homeowners' association to refuse to allow a reasonable modification to the premises when such a modification may be necessary to afford persons with disabilities full enjoyment of the premises. Required Documentation is as follows:
 - A provider is entitled to obtain information that is necessary to evaluate if a requested reasonable accommodation may be necessary because of a disability. If a person's disability is obvious, or otherwise known to the provider, and if the need for the requested accommodation is also readily apparent or known, then the provider may not request any additional information about the requester's disability or the disability-related need for the accommodation.
 - If the requester's disability is known or readily apparent to the provider, but the need for the accommodation is not readily apparent or known, the provider may request only information that is necessary to evaluate the disability-related need for the accommodation.
 - If the requesters disability is not obvious or the need for the request is not obvious, a housing provider may request reliable disability-related information that (1) is necessary to verify that the person meets the Act's definition of disability (*i.e.*, has a physical or mental impairment that substantially limits one or more major life activities), (2) describes the needed accommodation, and (3) shows the relationship between the person's disability and the need for the requested accommodation.
- **Guidance for Creation of Nondiscrimination and Fair Housing Policies.** All provider agencies, including assessment centers are required to uphold and provide to the Western CoC designated Lead Agency of CE with the following:

²¹ For more information refer to the HUD/DOJ joint statement, *Reasonable Modifications Under The Fair Housing Act*, <https://www.equalhousing.org/wp-content/uploads/2014/09/2008-Reasonable-Modifications-FAQ.pdf> and the Housing Equality Center of Pennsylvania's *Guide to Reasonable Accommodations and Modifications* <https://www.equalhousing.org/wp-content/uploads/2020/02/Fair-Housing-Guide-to-Reasonable-Accommodations-and-Modifications.pdf>



- Verification that they have policies which ensures the agency does not tolerate discrimination and comply with all nondiscrimination, fair housing, and equal opportunity laws.
- Verification of availability of aids and services, upon request, to ensure effective communication, such as the availability of qualified sign language interpreters, documents in Braille, or other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.
- Verification that a Project has a reasonable accommodation policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
- If the agency acts as a landlord, verification that the agency has a reasonable modification policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
- Verification that the agency has a complaint procedure to provide to the Project participant to report discrimination.

HMIS PARTICIPATION All Projects, apart from Domestic Violence (DV) Projects, must enter data into PA HMIS accurately and in a timely manner (defined as within 7 days), as defined in the PA HMIS Data Quality and Functionality Plan²². DV Projects must enter data into a comparable database accurately and in a timely manner and make their aggregate data available to the CoC for planning, monitoring and ranking. In the Western PA CoC, ETO is the recognized comparable database for DV Projects. Projects should use this data to measure project outcomes and identify areas for improvement. Non-CoC and non-ESG-funded projects are also encouraged to track project data using HMIS or a DV comparable database.

HOMELESS PARTICIPATION Each recipient and subrecipient of assistance under this part must, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.

- CoC-funded projects must follow 24 CFR 578.75²³ General operations (g) Participation of homeless individuals. Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This

²² <https://pennsylvaniacoc.org/sites/default/files/attachments/2020-11/PA-601%20Appendix%20B%20PA%20HMIS%20Data%20Quality%20and%20Functionality%20Plan%20v.1.0.pdf>

²³ <https://www.law.cornell.edu/cfr/text/24/578.75>



- requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.
- ESG-funded projects must follow 24 CFR 576.405²⁴. The provisions requiring homeless participation on boards or in an advisory capacity can be fulfilled by ESG Grantees bringing any policy decisions regarding their facility and services to the CoC governing board where homeless participation is already existing. Also, to the maximum extent practicable, Grantees should involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG Project, and in providing services for occupants of facilities assisted with ESG.

HOUSEHOLDS WITH CHILDREN For projects that serve households with children:

- Projects must take the educational needs of children into account when families are placed in housing and to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.
- A staff person must be designated as the educational liaison that will ensure that children are enrolled in school, connected to appropriate services in the community, including early childhood Projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services.
- Projects are prohibited from denying assistance to or separating members of a family with children based on gender or age.
- Prohibition against involuntary family separation. The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part.

See HUD FAQ # 1529²⁵, which is relevant to this requirement.

HOUSING FIRST AND LOW-BARRIER ACCESS Housing First is a proven approach in which all people experiencing homelessness are believed to be housing ready and are provided with permanent housing immediately and with few to no preconditions, behavioral contingencies, or barriers. Effectively implementing a Housing First approach involves prioritizing people with the highest needs and vulnerabilities, engaging more landlords and property owners, and making our projects client-centered spaces without barriers to entering and remaining in the project. Projects should follow the principles of Housing First and Low-Barrier access, which include:

- Admission/tenant screening and selection practices promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, and participation in services.

²⁴ <https://www.law.cornell.edu/cfr/text/24/576.405>

²⁵ <https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>



- Applicants may not be rejected by agencies based on poor credit or financial history, income, poor or lack of rental housing, minor criminal convictions, or behaviors that indicate lack of “housing readiness.”
- Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly tenant-driven without predetermined goals. Participation in services or Project compliance is not a condition of PSH. RRH Projects may require case management as a condition of receiving rental assistance.
- Participation in services or project compliance is not a condition of staying in the project.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered reason for eviction by the Agency. Receiving approval from the CoC, agencies may adopt a “no use or consumption” on property rule.
- The project prioritizes those with the highest need for services (in accordance with CE policies and procedures), rather than "first come/first served".
- Case managers/service coordinators are trained in and actively employ evidence-based practices for client/tenant engagement such as motivational interviewing and client-centered counseling.
- Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and/or addiction are a part of tenants' lives, where tenants are engaged in non-judgmental communication regarding drug and alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.

See **Appendix C for CoC Access/Barriers Policy**, which outlines expectations regarding Housing First.

For more information on suggested Housing First implementation ideas please refer to **USICH’s Housing First Checklist**²⁶.

INSPECTIONS Rental units assisted with CoC Rental Assistance payments must meet *Housing Quality Standards* per 24 CFR 982²⁷ and 24 CFR 578.75²⁸. ES that receive assistance for shelter operations are required to meet *Minimum Habitability Standards*. If ESG funds are used to help a Project participant remain in or move into permanent housing, that housing must also meet Minimum Habitability Standards. Shelters renovated with ESG funds are also required to meet state or local government safety and sanitation-standards as applicable and use energy-efficient

²⁶ https://www.usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf

²⁷ <https://www.law.cornell.edu/cfr/text/24/part-982>

²⁸ <https://www.law.cornell.edu/cfr/text/24/578.75>



materials including Energy Star and WaterSense products and appliances. Refer to 24 CFR 576.403²⁹ for details on the housing standards. Moreover:

- Lead-based paint remediation and disclosure applies to all ESG-funded shelters and all housing occupied by ESG participants. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821- 4846³⁰), and the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C 4851-4856³¹), subparts of the implementing regulations at 24 CFR 35, Subparts A, B, H, J, K, M and R³² apply to activities under this grant Project. The Grantee must also comply with the Lead, Renovation, Repair, and Painting Project Final Rule, 40 CFR 745³³, where applicable.

LIMITED ENGLISH PROFICIENCY All CoC- and ESG-funded projects should take reasonable steps to ensure meaningful access to their projects and activities by individuals with Limited English Proficiency, regardless of the language spoken. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Grantees must follow the requirements outlined in 24 CFR 576.407(b)³⁴. HUD published Final Guidance to Federal Financial Assistance Requirements Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons in the Federal Register on January 22, 2007 (72 F.R. 2732)³⁵.

MATCHING FUNDS CoC-funded projects must follow 24 CFR 578.73³⁶ Matching requirements. ESG-funded projects should refer to the application and regulations associated with their contract year.

PERFORMANCE MEASURES All projects are expected to strive to meet CoC Performance Goals per the Western Pennsylvania Continuum of Care Monitoring Plan³⁷ (performance measures by project type are provided below under Standards by Project Type).

POINT IN TIME COUNT PARTICIPATION All CoC and ESG-funded Projects must participate in the annual point-in-time count, including participation in the unsheltered count if needed.

²⁹ <https://www.law.cornell.edu/cfr/text/24/576.403>

³⁰ <https://www.law.cornell.edu/uscode/text/42/chapter-63>

³¹ <https://www.law.cornell.edu/uscode/text/42/chapter-63A>

³² <https://www.law.cornell.edu/cfr/text/24/part-35>

³³ <https://www.law.cornell.edu/cfr/text/40/part-745>

³⁴ <https://www.law.cornell.edu/cfr/text/24/576.407>

³⁵ <https://www.federalregister.gov/documents/2014/11/28/2014-27960/guidance-to-federal-financial-assistance-recipients-regarding-the-title-vi-prohibition-against>

³⁶ <https://www.law.cornell.edu/cfr/text/24/578.73>

³⁷ <https://pennsylvaniacoc.org/sites/default/files/attachments/2020-12/Western%20PA%20CoC%20Monitoring%20Plan%2C%20proposed%20revisions%2C%206-29-18.pdf>



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

The Western PA CoC CE System (CES) provides the platform for projects to adhere to the prioritization standards that follow. The CES is required to provide a tool for evaluating households’ chronicity, medical vulnerability, acuity, and ability to address their own housing instability. To learn more about how CE integrates with these standards, please Coordinated Entry policy documents at: <https://pennsylvaniacoc.org/balance-state-western-pa-coc/western-pa-coc-coordinated-entry-committee>.

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

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

In comparing households for enrollment, providers should utilize the priorities outlined below. Where households are identified within the CES as having the same acuity (assessment tool score), providers should use additional information gathered from their intake conversations, other CES tools, and from the assessment center staff to make a judgement decision on which household should be prioritized based on the following tie-breaking criteria:

- Unsheltered vs. sheltered households
- Length of time homeless
- Excessive use of emergency services (e.g., Hospital Emergency Departments or police)
- Significant physical or behavioral health challenges
- Significant Intellectual or Developmental Disabilities
- Vulnerability to death or serious illness
- Vulnerability to victimization (e.g., trading sex for housing, human trafficking, Domestic Violence, sexual assault, criminal activity, etc.)



- Other documented barriers that demonstrate more serious housing instability (comparatively)

Project case managers should include supporting documentation and make case notes when making tie-breaking decisions to demonstrate the reasoning used to prioritize the selected household.

For specific information on prioritization by project type, please see “Standards by Project Type” sections.

PROJECT EVALUATION All projects are expected to evaluate and report project outcomes. Projects that do not meet an expected threshold will be required by the CoC to develop and implement a Quality Improvement Plan.

TERMINATION Projects should have a formal procedure for terminating a participant’s assistance that recognizes the rights of the participant(s) involved:

- Eviction by a landlord in a scattered site project should not result in termination from the ESG/CoC project.
- Projects must use judgement and examine all extenuating circumstances in determining whether a violation should result in termination; assistance is terminated in only the most severe cases.
- Every effort should be made to allow the participant to remain in the project.
- Projects should follow a Housing First approach which outlines the following tenets related to terminations:
 - Housing is not dependent on participation in services, or demonstration of progress made on a service plan. Services must be offered by staff but are voluntary for participants. Note: RRH Projects *may* require that participants meet with their case managers every 30 days, per HUD CoC Interim Rule.
 - Substance use is not a reason for termination. Note: If a project is a recovery housing model, focused on people who are in early recovery from drugs or alcohol (as outlined in HUD’s Recovery Housing Brief: <https://www.hudexchange.info/resource/4852/recovery-housing-policy-brief/>), different standards related to use and subsequent offer of treatment may apply.
- Termination does not preclude assistance at a future date.
- Termination should not result in a return to homelessness, instead households should be referred either back to the CoC’s CES for enrollment into an appropriate project or to another non-CE-related resource pursuant to their level of need.

Possible reasons for termination:

- Termination will occur if the qualifying member of the household:
 - Is institutionalized or incarcerated for 90 days or more (PH Projects only);



- Moves out of the service area;
- Voluntarily exits the project; or
- Passes away
- Termination may also occur if the participant has moved out of their unit and the project is unable to make contact with the participant. The project should make multiple attempts, using different methods (such as phone, in-person visits, and written notice) to make contact with participants.
- Participants who repeatedly and/or seriously violate project rules or conditions may be terminated from the project. However, in the spirits of the supportive aspects of homeless assistance projects, the agency will document reasonable efforts and interventions that demonstrate attempts to encourage participants' compliance with project rules and expectations.
- In some severe cases (e.g., violence, or serious threats of violence, toward Project staff, volunteers or other participants; significant safety risk to self or others), termination from the project may be immediate.

Further per 24 CFR 576.402³⁸ – Terminating Assistance (ESG) and 24 CFR 578.91³⁹ (CoC):

- In general: If a project participant violates project requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgement and examine all extenuating circumstances in determining when violations warrant termination so that a project participant's assistance is terminated only in the most severe cases.
- Project participants receiving rental assistance or housing relocation and stabilization services: To terminate rental assistance or housing relocation and stabilization services to a project participant, the required formal process, at a minimum, must consist of:
 - Providing the project participant with a written copy of the project rules and the termination process before the participant begins to receive assistance;
 - Written notice to the project participant containing a clear statement of the reasons for termination;
 - A review of the decision, in which the project participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
 - Prompt written notice of the final decision to the Project participant.

³⁸ <https://www.law.cornell.edu/cfr/text/24/576.402>

³⁹ <https://www.law.cornell.edu/cfr/text/24/578.91>



See “General Standards for All Projects- Termination,” for more details on participant terminations.

TRANSFERS

- **Emergency Transfers:**
 - Projects must follow the CoC’s **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking**⁴⁰ (Appendix D).
 - In accordance with the VAWA, Western PA CoC homeless assistance Projects providing housing or rental assistance must allow participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant’s current unit to another unit. This requirement applies to Projects receiving CoC funding, as well as DCED ESG funding, in accordance with DCED policies and requirements. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation,
 - CoC/ESG providers will work with the Western PA CoC’s CES to enact an emergency transfer through resources beyond those available within the providers own organization. The ability of the Western PA CoC’s CES to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether another dwelling unit is available and is safe to offer the participant for temporary or more permanent occupancy.
 - A participant is eligible for an emergency transfer when any member of the household is a victim of domestic violence, dating violence, sexual assault, or stalking, and reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements of the policy.
 - For families receiving tenant-based rental assistance, the following procedures will be followed for non-transferring family member(s), if the family separates in order to affect an emergency transfer:
 - For families living in units that are otherwise assisted, the required policies must provide that for project participants who qualify for an emergency transfer, the individual or family shall have priority over all

⁴⁰ <https://pennsylvaniacoc.org/sites/default/files/attachments/2020-12/Western%20PA%20CoC%20-%20VAWA%20Emergency%20Transfer%20Plan%20Policy.pdf>



other applicants for rental assistance, TH, and PSH projects funded through the CoC provided that the individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFA; and the individual or family meets any additional criteria or preferences established in accordance with Fair Housing 24 CFR 578.93(b)(1), (4), (6) or (7)⁴¹. The individual or family shall not be required to meet any other eligibility criteria or preferences for the project. The individual or family shall retain their original homeless or chronically homeless status for the purposes of the transfer.

- Please see **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Appendix D)** and **CoC Domestic Violence, Dating Violence, Sexual Assault & Stalking Management Policy (Appendix J)** for information on: Emergency Transfer Request Documentation, Confidentiality, Emergency Transfer Timing and Availability, and Protocol for Transfer Request.
- **Transfers between projects within the same project model**
 - When a current household must transfer to another Project within the same Project model (e.g., PSH to PSH), the provider should prioritize the household for resources operated by/available through their own organization.
 - If the provider cannot transfer the client internally, they should complete a **Transfer Request Form (Appendix E)** and follow the instructions provided on the form.
 - Please see full **Transfer policy in Appendix E.**
- **Transfers from one project model to another (RRH to PSH)**
 - Project transfers may be made from RRH or TH to PSH so long as the household meets the eligibility criteria under the specific project and the requirements for the PSH project in the NOFA for the year the project was awarded.
 - Please note: RRH providers are expected to gather all information necessary to determine if a household meets the chronic homeless definition (disability information and verification of homelessness, see **Templates for CoC and ESG related programs Supplemental Resource**) within 45 days of project enrollment. These documents should be uploaded to the global client documents within HMIS. Failure to do so will not allow for these households to receive the necessary additional priority for being chronically homeless for transfers.
 - All transfers from one project model to another must begin with the completion of the **Transfer Request Form (Appendix E)** and should follow the directions provided on the form.

⁴¹ <https://www.law.cornell.edu/cfr/text/24/578.93>



- Please see full **Transfer Policy (Appendix E)**.

RECORD KEEPING STANDARDS FOR ALL PROJECTS

All Projects should maintain records in keeping with the following basic standards. In addition, Project providers must maintain documentation as required by the specific Project regulations:

FINANCIAL RECORDKEEPING REQUIREMENTS

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

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

- ESG requirements provided in 24 CFR 576.500 - Recordkeeping and Reporting Requirements⁴².
- CoC requirements provided in 24 CFR 578.103 Recordkeeping Requirements⁴³.

PARTICIPANT RECORDKEEPING REQUIREMENTS

CE PARTICIPATION Documentation of project entrance through CE, including common assessment tool score and other factors used to determine priority, vulnerability and housing placement.

GENERAL ELIGIBILITY All Projects must evaluate and document individuals' and family's eligibility per the HEARTH Homeless Definition Final Rule⁴⁴. The specific Category/ies of homeless eligibility and required documentation are provided with each Project type.

GOAL PLANS/HOUSING STABILITY PLANS A record of services and assistance provided to each participant, including initial and updated goal plans- See **sample Housing Stability Plans (See Templates for CoC and ESG related programs Supplemental Resource)**. Projects

⁴² <https://www.law.cornell.edu/cfr/text/24/576.500>

⁴³ <https://www.law.cornell.edu/cfr/text/24/578.103>

⁴⁴ <https://www.govinfo.gov/content/pkg/FR-2011-12-05/pdf/2011-30942.pdf>



should choose from among these examples, or create a template that includes all the elements included in the housing stability plan templates.

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

HOUSING/HOMELESS STATUS Homeless or at-risk statuses must be documented for all programming. The priority for obtaining evidence, in order of preference, is as follows:

- Third-party documentation (**shelter agreement and/or Homeless Certification- See Templates for CoC and ESG related programs Supplemental Resource**)
- Intake worker observations (written verification of observations required, along with additional information, such as photographs, as feasible).
- Certification from the person seeking assistance (**Self Declaration of Housing Status- See Templates for CoC and ESG related programs Supplemental Resource**) (if this option is utilized, there must also be a written record of intake worker's due diligence to obtain above evidence).

However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to ES, receiving SO services, or being immediately admitted to shelter or receiving services provided by a victim service provider, as defined in section 401(32) of the McKinney-Vento Homeless Assistance Act, as amended by the HEARTH Act. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates entries are made.

For individuals exiting an institution - one of the forms of evidence above to document prior homelessness AND:

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

INCOME DOCUMENTATION (THIS APPLIES TO HP, ES, TH, TH-RRH, RRH AND PSH PROJECTS) Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609⁴⁵. Annual income is defined as all amounts, monetary or not, which:

⁴⁵ <https://www.law.cornell.edu/cfr/text/24/5.609>



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

Annual Income should be calculated considering:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation of a business (i.e., total revenue minus business operating expenses). This also includes any withdrawals of cash from the business or profession for your personal use.
- Monthly interest and dividend income credited to an applicant's bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
- Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.
- Income of Full-Time Students: The employment income of full-time students in excess of \$480 is not counted in the annual income calculation.

Income will be verified through bank statements, award letters and/or recent paystubs when possible. When this is not possible, a letter from the employer, stating wages, will also suffice.

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

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

- When a client has income, but does not know the exact amount, a “Yes” response should be recorded for both the overall income question and the specific source, and the income amount should be estimated.



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

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

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

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

CASE MANAGEMENT STANDARDS FOR ALL PROJECTS

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

- Development of a **Housing Stability Plan (See Templates for CoC and ESG related programs Supplemental Resource)** with households. Plans are highly participant-driven without predetermined goals, and should build on each participant's needs, goals,



and strengths. The Housing Stability Plan should be reviewed monthly and revised, at a minimum, every 3 months. More frequent revisions will be needed during times of acute crisis.

- Creative problem solving to help households to self-resolve their housing crisis.
- Linkage to community-based services per the Housing Stability Plan.
- Promote access to and effective utilization of mainstream benefits:
 - Transportation assistance
 - Assistance with enrollment in income and non-income benefits
 - Follow-up at least annually to ensure benefits are received and renewed
 - Ensure access to SSI/SSDI technical assistance

A list of projects and examples of mainstream resources are provided in **Appendix G**.

- Engage participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement into permanent housing or maintenance of permanent housing. Projects should involve households in decisions about what they need to end their homelessness. This programming and planning should be respectful, incorporate strengths-based approaches and consumer choice.
- Help households address issues that may impede access to housing (such as credit history, arrears, and legal issues).
- Assist households with finding, moving into and maintaining housing. This may include engaging landlords and working closely with landlords to facilitate participant move-in and ongoing success in housing.
- Make appropriate and time-limited services and supports available to families and individuals to allow them to move quickly to permanent housing and/or retain permanent housing.
- Collect required documentation, per funder requirements.
- Provide or assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals. This includes providing or ensuring that the household has access to resources including childcare, education, employment and job training, financial literacy, health, legal services, public benefits access, substance use recovery, and transportation, among others (if needed and appropriate) so that they can sustain permanent housing upon exit. This includes providing advocacy on behalf of households as needed to access necessary services.
- For scattered site projects: assist with housing location, lease negotiation, determining rent reasonableness, and inspection.
- For SSO, ES, and TH projects: Help households identify and select among various permanent housing options based on their unique needs, preferences, and financial resources.

PRINCIPLES OF CASE MANAGEMENT

- Person-Centered



- Case Managers practice a person-centered approach that “ensures that the person who has experienced homelessness has a major say in identifying goals and service needs, and that there is shared accountability. The goal of case management is to empower people, draw on their strengths and capabilities, and promote an improved quality of life by facilitating timely access to the necessary supports, thus reducing the risk of homelessness and/or enhancing housing stability.”⁴⁶ Services should be client-directed, highly individualized and tailored to participant’s needs, respectful of individuals’ rights to self-determination, and voluntary. Case Managers should be trained in person-centered case management strategies including Trauma-Informed Care, Motivational Interviewing, Critical Time Intervention and Harm Reduction, among others.
- Housing-Focused
 - Projects should focus on the goal of assisting clients to secure and maintain permanent, stable, affordable housing. For clients not currently in safe, decent, affordable housing, the primary goal is to develop a strategy to assist them in securing housing. For those already housed, the goal is to assure that adequate supportive services are in place so the client can maintain housing.
- Trauma-informed care
 - Trauma-informed care is an organizational structure and framework that involves understanding, recognizing, and responding to the effects of all types of trauma. It emphasizes physical, psychological and emotional safety for both participants and providers, and helps participants rebuild a sense of control and empowerment. Trauma-informed care operates with the following principles:
 - **Consumer empowerment:** Using individuals’ strengths to empower them in the development of their goals;
 - **Choice:** Informing consumers regarding Project and housing options so they can choose the options they prefer;
 - **Collaboration:** Maximizing collaboration among staff, participants and their families in organizational and individual goal planning;
 - **Safety:** Developing healthy home settings and activities that ensure consumers’ physical and emotional safety; and
 - **Trustworthiness:** Creating clear expectations with consumers about what proposed Projects entail, who will provide services, and how supports will be provided.
- Progressive engagement
 - Progressive Engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without assistance.

⁴⁶ <https://www.homelesshub.ca/about-homelessness/service-provision/case-management>



- Progressive engagement recognizes that there is no way to accurately predict how much help someone may need to end their homelessness and avoid a return to the streets or shelter. While we know that many people can successfully exit homelessness and avoid immediately returning with a small amount of assistance, we also know that there are no dependable predictors to guide the amount of assistance needed. In this approach, participants are initially offered “light-touch” assistance, including help creating a reasonable housing placement/stabilization plan, housing information and search assistance, and limited financial assistance (first month’s rent, security deposit, short-term rental assistance). Progressive engagement may involve more frequent contacts during a participants’ early time in the project. All client check ins should include a discussion of the housing stability plan to review progress, barriers and supports needed.
- Projects using Progressive Engagement regularly reassess housing barriers and seek to close cases as soon as housing retention barriers are resolved. Projects should strive to provide the minimum level assistance necessary (i.e., lightest possible touch or just enough) for the shortest time possible to achieve housing stability.
- Housing First (as related to case management)
 - Supportive services emphasize housing procurement over therapeutic goals. Participation in services or project compliance is not a condition of staying in the project.
 - Case managers/service coordinators are trained in and actively employ evidence-based practices for client/tenant engagement such as motivational interviewing and client-centered counseling.
 - Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of tenants' lives, where tenants are engaged in non-judgmental communication regarding drug and alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.
 - Refer to “General Standards for All Projects- Housing First and Low-Barrier Access” and “General Standards for All Projects-Termination” already mentioned for more detail.

FREQUENCY The frequency of case management services depends on the unique needs and situation of every project participant. Case Managers should be in direct contact with their clients at least once a month.⁴⁷ The frequency of direct contact may increase due to the household’s

⁴⁷ Regular case management meetings may not be possible where prohibited by Violence Against Women Act (“VAWA”) and the Family Violence Prevention and Services Act (“FVPSA”).



homeless status, acute needs, and overall lack of housing stability. In-person meetings with clients are preferred. Additional details about case management frequency can be found in the subsequent Project sections. The level of Case Management support is to match the needs of the household, addressing factors that can negatively impact housing stability. As such, the intensity of Case Management frequency, duration, and support can and will change over time.

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

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

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

STANDARDS BY PROJECT TYPE

PERMANENT SUPPORTIVE HOUSING (PSH)

PSH is community-based housing without a designated length of stay, offering a higher-level project option for those in need of such interventions. It is important to note that as needs change, a lower-level intervention may be more appropriate, at which time other options may be explored and decided upon between the project and participant. PSH provides housing assistance and supportive services to assist project participants to maintain their housing stability.

Access

Referrals to PSH must come through CE.

Eligibility



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

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence
AND
- At least one member of the household must have a disability

Regarding Project Transfers into PSH: In accordance with CE policy/procedure for transitioning households from RRH to PSH, households in RRH who are both eligible for PSH and in need of non-time limited supportive housing will be eligible to transfer from RRH to PSH. See **CoC Transfer Policy (Appendix E)**.

Prioritization

Households must be prioritized through CE in accordance with HUD's most current Notice on *Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in PSH*⁴⁸ (CPD-16-11 is the operational Notice at the time of the development of this Plan) and with the CoC's Order of Prioritization.

All CoC and ESG funded projects are required to prioritize individuals and families with the longest history of homelessness and with the most severe service needs for all available CoC resources. The determination of severe service needs will be based on the score created from the Coordinated Entry Assessment tool. A higher score demonstrates a higher service need.

100% of CoC-funded PSH units are chronic dedicated. This means that they should first be made available to a household that meets the chronically homeless definition. If there are no chronically homeless households choosing to occupy a particular PSH unit, it may then be rented to a non-chronically homeless household per the Order of Prioritization below.

Order of Prioritization for PSH Providers:

1. Chronically Homeless – Currently Literally Homeless*
2. Chronically Homeless – Needing a PSH to PSH Transfer (Chronic Status Documented by Current Provider within 45 days of Current Project Enrollment)*
3. Chronically Homeless – Needing a RRH to PSH Transfer (Chronic Status Documented by Current Provider within 45 days of Current Project Enrollment)*
4. Non-Chronic – Severe Needs as Indicated by Assessment (i.e., Higher Score)
5. Non-Chronic – Severe Needs as Indicated by Assessment (i.e., Higher Score) and Currently Needing PSH to PSH Transfer

⁴⁸ <https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>



6. Non-Chronic – Severe Needs as Indicated by Assessment (i.e., Higher Score) and Currently Needing RRH to PSH Transfer
7. Non-Chronic – Currently Literally Homeless or Category 4 Homeless and based on Length of Time Homeless
8. Non-Chronic – PSH to PSH Transfer based on Length of Time Homeless
9. Non-Chronic – RRH to PSH Transfer based on Length of Time Homeless
10. Non-Chronic – Needing a TH to PSH Transfer and Household was Chronically Homeless at Project Entry (Chronic Status Documented by Current Provider within 45 days of Current Project Enrollment)^
11. Non-Chronic – Needing TH to PSH Transfer based on Severe Needs as Indicated by Assessment (i.e., Higher Score)^
12. Non-Chronic – Needing TH to PSH Transfer based on Length of Time Homeless^

Note: For information on serving Category 4 households (households fleeing DV) in PSH, please see HUD AAQ response⁴⁹, which outlines Category 4 eligibility for chronic-dedicated and non-chronic dedicated PSH.

*One by One [the Western PA CoC] is committed to client-choice but also understands the need to prioritize the limited PSH resources in the Continuum. **Therefore, in applying the order of priority, Projects filling PSH openings shall consider the household’s county of preference for priorities 1-3, but will extend their inquiry to the entire CoC (regardless of household choice) for all chronically homeless households prior to moving to priorities 4-12.**

^While TH to PSH transfers are eligible under the order of priority, TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. Therefore, TH residents will not be prioritized for PSH transfers.

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

⁴⁹ https://mcusercontent.com/e1a442ef49ad7761f7575387a/files/4e6594a2-abd3-4e27-bde0-1c3d59750bc5/HUD_AAQ_Response_re_Category_4_eligibility_for_PSH.pdf



Violence, Dating Violence, Sexual Assault, or Stalking (Appendix D). See CoC Domestic Violence, Dating Violence, Sexual Assault & Stalking Management Policy (Appendix J).

Documentation

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

- Each potential Project participant must have **Documentation of Disability** prior to Project enrollment- see **Templates for CoC and ESG related programs Supplemental Resource**.
- Each potential Project participant must have **Documentation of Chronic Status** prior to Project enrollment -see **See Templates for CoC and ESG related programs Supplemental Resource**.
- CoC-funded PSH projects must also follow the recordkeeping recommendations of HUD CPD Notice 16-11 regarding: Evidence of Severe Service Needs; Evidence that the Recipient is Following the CoC’s Written Standards for Prioritizing Assistance; and Evidence that there are no Households Meeting Higher Order of Priority within CoC’s Geographic Area.

Duration and Amounts

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

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

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



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

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

Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards. Additional minimum standards for this project type include:

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

Case Management

Relevant minimum standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Support services must be made available to Project participants, but they may not be required for continued Project eligibility.
- Case managers should offer monthly case management meetings, with more offered as needed (especially in the first year). Household case management needs may decrease over time. While participation in services is voluntary, case managers should offer services to all participants and work to engage participants, even if services have been declined in the past.
- If participants are found to no longer need supportive services, or to need limited services, the Project should work with the participant to explore Move On options. These discussions should be driven by client choice.



- **Move On Strategies:** HUD encourages communities to explore Moving On strategies for clients in PSH who may no longer need or want the intensive services offered in PSH but continue to need assistance to maintain their housing. Moving On strategies challenge a community to create partnerships between the CoC/PSH housing Project and mainstream housing Projects, such as public housing, the Housing Choice Voucher (HCV) Project, and HUD-funded multifamily housing providers.
- Some indicators that a client may be ready to explore Move On options (not all indicators may be present; assessment of Move On should be client-driven and based on client needs and wants):
 - Client no longer needs the intensive services provided on PSH, and/or is connected (or can be connected) to community-based services that are not tied to participation in the PSH Project (e.g., housing choice vouchers, behavioral health case management, peer support, care management, etc.). The client feels as though they have enough supports in place to maintain stabilization without PSH Project services;
 - Goals in previously created goal plans have been accomplished;
 - The household is paying rent in full (or to the level agreed upon as described above);
 - The client's primary service need is rental assistance/access to affordable housing;
 - The client would like to explore other housing opportunities.
- For more information on Move On strategies, see HUD's **SNAPS in Focus: Moving On Strategies to Support Stable Transitions from PSH**⁵⁰.

Performance Measures

The CoC has established the following performance goals for PSH Projects:

- At least 95% of households in PSH retain their housing or exit to permanent housing. (CoC Monitoring Plan)
- No more than 6% of households that exit to permanent housing after being homeless should become homeless again within 12 months. (CoC Monitoring Plan)
- No more than 9% of households that exit to permanent housing after being homeless should become homeless again within 2 years. (CoC Monitoring Plan)

⁵⁰ <https://www.hudexchange.info/news/snaps-in-focus-moving-on-strategies-to-support-stable-transitions-from-permanent-supportive-housing>



- At least 40% of adults served by PSH Projects will increase their income through either employment or benefits; 19% will increase earned income and 25% will increase non-employment income. (CoC Monitoring Plan)
- At least 70% of households served under a PSH Project will be linked to mainstream resources. (2020 CoC Renewal Scoring)

RAPID REHOUSING (RRH)

The standards adopted for RRH apply to projects funded under both ESG and CoC unless otherwise noted. RRH is an intervention designed to help individuals and families quickly exit homelessness and return to permanent housing. RRH assistance is offered without preconditions — like employment, income, absence of criminal record, or sobriety — and the resources and services provided are tailored to the unique needs of the household.

Access

All referrals to RRH must come through CE.

Eligibility

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

- Category 1: Literally Homeless
 - Category 4: Fleeing/Attempting to Flee Domestic Violence*
- AND
- Must be unable to access housing without assistance

*Currently under ESG, Category 4 households must also meet the requirements of Category 1; and for CoC-funded RRH funded prior to 2015, households must also meet the requirements of Category 1. An individual or family that qualifies as homeless under Category 4 but does not meet Category 1 as well would not be eligible for ESG RRH assistance but may be eligible for ESG HP assistance. (24 CFR 576.104⁵¹)

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

⁵¹ <https://www.law.cornell.edu/cfr/text/24/576.104>



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

Regarding Project Transfer into RRH: Households served through HUD-funded TH are not eligible for CoC-funded RRH. This does not apply to CoC-funded TH/RRH project types, in which case participants can be dually enrolled in that specific joint Project if they choose. Upon exit of a non-joint TH Project, however, they are eligible for ESG-funded RRH if they have no other resources.

Prioritization

All CoC- and ESG-funded projects are required to prioritize individuals and families with the longest history of homelessness and with the most severe service. The determination of severe service needs will be based on the score created from the CE Assessment tool. A higher score demonstrates a higher service need.

Order of Prioritization for RRH Projects:

1. Chronically Homeless – Currently Literally Homeless*
2. Non-Chronic – Severe Needs as Indicated by Assessment (i.e., Higher Score)
3. Non-Chronic – Currently Literally Homeless (Category 1) or Category 4 Homeless and based on Length of Time Homeless
4. Non-Chronic – Needing a TH to RRH Transfer and Household was Chronically Homeless at Project Entry (Chronic Status Documented by Current Provider within 45 days of Current Project Enrollment)^
5. Non-Chronic – Needing TH to RRH Transfer based on Severe Needs (i.e., Higher Score) as Indicated by Assessment
6. Non-Chronic – Needing TH to RRH Transfer based on Length of Time Homeless

*The CoC is committed to client-choice but also understands the need to prioritize the limited RRH resources in the Continuum. **Therefore, in applying the order of priority, projects filling RRH openings should consider the household's county of preference for priority 1, but will extend their inquiry to the entire CoC (regardless of household choice) for all chronically homeless households prior to moving to priorities 2-6.**

^While TH to RRH transfers are eligible under the order of priority, TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. Therefore, TH residents will not be prioritized for RRH transfers (except specifically TH-RRH projects).



Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, or Stalking: If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victim sof domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Appendix D)**. See **CoC Domestic Violence, Dating Violence, Sexual Assault & Stalking Management Policy (Appendix J)**.

Documentation

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

- For ESG-funded RRH, the **Documentation of Homelessness Checklist (See Templates for CoC and ESG related programs Supplemental Resource)** must be completed and uploaded into HMIS prior to enrollment of a household into a RRH Project.
- For ESG-funded RRH, an executed **Landlord-agency Agreement (See Templates for CoC and ESG related programs Supplemental Resource)** must be on file. Projects must offer a standard, basic level of support to all landlords who lease to project participants as detailed in a written agreement that should be signed by the Case Manager or Housing Locator and the landlord. At a minimum, this agreement should specify that the Case Manager and/or Housing Locator will:
 - Inform the landlord about the amount and duration of financial assistance being provided to the participant;
 - Respond quickly (ideally within one business day) to landlord calls about serious tenancy problems;
 - Seek to resolve conflicts around lease requirements, complaints by other tenants, and timely rent payments; and,
 - If necessary, help negotiate move-out terms and assist the participant to quickly locate and move into another unit without an eviction.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The **Lease (see sample in Templates for CoC and ESG related programs Supplemental Resource)** must include:
 - Renter's name and property address;
 - Landlord's name and address;



- Lease start and end dates;
- Monthly rent amount (including the prorated amount for the first month if a partial month);
- Security deposit amount (if any);
- Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
- Signatures of both parties.
- Other documents required in all case files:
 - Passed Inspection (Minimum Habitability Standards and Lead-Based Paint for ESG-funded RRH and Housing Quality Standards for CoC-funded RRH). The passed inspection must be dated BEFORE the lease and, for ESG, before the landlord-agency agreement is dated and executed.
 - **Housing Stability Plans (see Templates for CoC and ESG related programs Supplemental Resource)** are required and must include **information on financial assistance (See Templates for CoC and ESG related programs Supplemental Resource)** provided to the participant. RRH Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.

Duration and Amounts

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

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



permanent housing subsidy (i.e., HCV, PSH, etc.) the household may only be held accountable for a rent amount comparable to what they can expect to pay upon discharge from the RRH project.

Since rental and/or financial assistance is to match the needs of the household, the duration of assistance will vary by household, lasting for no longer than the household needs to stabilize. That said, most households should be stabilized within an average 6-month timeframe. In some instances, however, a subsidy may be needed for longer than 6 months, in which case an extension approval from the Project Manager should be obtained if the household would still qualify in terms of their income. Projects are to create their own internal extension approval process to be completed in writing at 6 and 9 months, if justified. Should a household need time beyond 12 months, the Case Manager is to seek approval from the CoC at 12, 15, 18, and 21 months if needed (**Approval Template- See Templates for CoC and ESG related programs Supplemental Resource**) Reasonable extension justifications include serving:

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

In no instances will a household receive more than 24 months of RRH assistance in any 3-year period, and no fees can be imposed on project participants beyond payment of rent.

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

- First month's rent can be offered in full to assist the household. In the event the first month is prorated, the first full month may also be paid in full, if commensurate with the household's need, and security deposits cannot exceed 2 months of actual rent.
- If, under the terms of the lease, the tenant is responsible for paying their own utilities, grantees must follow the requirements for utility payments and reimbursement per Notice: CPD-17-11⁵²:
 - CoC interim rule explicitly requires RRH projects to calculate rent as the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities established by the public housing authority (PHA) for the area in which the housing is located.

⁵² <https://www.hudexchange.info/resource/5630/notice-cpd-17-11-determining-program-participant-rent-contribution-in-the-coc-program/>



- For the purposes of determining the reasonable monthly utility consumption, Projects must use the local PHA’s schedule of utility allowances, which are based on unit size and the utilities the project participant is expected to pay. Grantees should contact their PHA to obtain the schedule of utility allowances and exception utility allowances.
- For ESG-funded projects, unit rent must NOT exceed Fair Market Rent (FMR) AND it must not exceed Rent Reasonableness. For CoC-funded Projects, unit rent may exceed FMR, but it may not exceed Rent Reasonableness. This means that a recipient or subrecipient is allowed to pay rents up to the rent reasonable amount even if this is higher than the FMR. If rent reasonableness rates are lower than FMR, the maximum allowable contract rent amount is still capped at rent reasonableness rates.
- Additional costs may be covered to assist households enrolled in RRH, but projects should refer to their actual grant application and NoFA/Project guidelines applicable to the contract year(s) they are funded for.

Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards. Additional minimum standards for this project type include:

- Households should be enrolled into rapid re-housing once it is mutually agreed upon (by the participant and the provider) that the two parties will be working toward permanent housing together. Providers should not wait until permanent housing is found to enroll the household.
- Exit planning should start upon Project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy or with a permanent subsidy resource such as Public Housing, Housing Choice Vouchers, affordable housing developments, etc. **(Exit Plan Template- See Templates for CoC and ESG related programs Supplemental Resource)**
- Income is reassessed at least quarterly for the purposes of adjusting rental payments. Although these income assessments should be accounted for in HMIS, they generally will not have a bearing on eligibility (apart from the Annual Assessment, at which time the household must fall within eligible income limits to be minimally eligible for continued RRH assistance). Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Conversely, if the household has not reached stabilization yet, they may still obtain RRH assistance, regardless of their actual income at non-Annual, quarterly Assessments. Some indicators of stability could be:
 - Goals cited in previously created goal plans will be realized



- The household will be paying rent in full (or to the level agreed upon as described above)
- The housing crisis is resolved
- The household feels as though they have enough supports in place to maintain stabilization without ESG's essential services
- Provide housing locator services. This includes:
 - Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
 - Provide education and outreach to landlords to address potential barriers to their participation
 - Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
 - Help individuals and families negotiate manageable and appropriate lease agreements with landlords

Case Management

Relevant minimum standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy.
- Case management meetings are required monthly, although additional meetings can always be offered by the case manager as needed and/or scheduled as requested by the client. Meetings should be in the client’s home or in a mutually agreed-upon community setting, as opposed to an office setting, to the greatest extent possible

Performance Measures

The CoC has established the following performance goals for RRH Projects:

- At least 81% of households who exit RRH exit to permanent housing. (CoC Monitoring Plan)
- No more than 6% of households that exit to permanent housing after being homeless should become homeless again within 12 months. (CoC Monitoring Plan)
- No more than 13% of households that exit to permanent housing after being homeless should become homeless again within 2 years. (CoC Monitoring Plan)



- At least 48% of adults served by RRH Projects will increase their income through either employment or benefits; 35% will increase earned income and 20% will increase non-employment income. (CoC Monitoring Plan)
 - At least 70% of households served under a RRH Project will be linked to mainstream resources. (2020 CoC Renewal Scoring)
-

TRANSITIONAL HOUSING (TH)

TH facilitates the movement of individuals and families experiencing homelessness to permanent housing.

The standards adopted for TH will apply to projects funded under the CoC and those “grandfathered” under ESG. These standards will also apply to the TH portion of CoC-funded joint TH/RR Projects, except where the TH/RR section of the CoC’s Written Standards indicate there is difference.

Enrollment is always based on client choice in conjunction with an assessment of health and safety needs. TH should be as low barrier as possible while honoring eligibility and prioritization criteria as outlined below.

Access

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

Eligibility

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

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

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



Non-HUD funded TH Projects may serve Categories 1, 2, 3 and 4⁵³, or per their established eligibility requirements.

Regarding Chronic Status: A household enrolled in TH for longer than 7 days loses their Chronic Homelessness status. The only exception is a household that is unsheltered and eligible for PSH may be provided a bed in a TH facility for up to 7 days if ES and Hotel Vouchers are unavailable. During these 7 days, they are not enrolled in the actual TH project and do not lose their Chronic designation. The household must comply with basic project rules related to occupancy but does not participate in the project (e.g., job training, life skills, etc.).

Prioritization

TH should be targeted to people who face more severe challenges to finding housing.

All CoC and ESG funded projects are required to prioritize individuals and families with the longest history of homelessness and with the most severe service needs for all available CoC resources. The determination of severe service needs will be based on the score created from the Coordinated Entry Assessment tool. A higher score demonstrates a higher service need.

While many people who have traditionally been assisted in long-term congregate TH may be served more efficiently in other project models, this model may be appropriate for some people, including:

- Certain individuals and heads of households struggling with a substance use disorder;
- Individuals in early recovery from a substance use disorder who may desire more intensive support to achieve their recovery goals. (Many individuals with substance use disorders can achieve sobriety through outpatient support and do not require residential support);
- Survivors of domestic violence or other forms of severe trauma who may require and prefer the security and onsite services provided in a congregate setting to other available housing options; and
- Unaccompanied and pregnant or parenting youth (age 16-24) who are unable to live independently (e.g., unemancipated minors) or who prefer a congregate setting with access to a broad array of wraparound services to other available housing options.

Order of Prioritization for TH Projects:

1. Chronically Homeless – Currently Literally Homeless (unsheltered)*
2. Chronically Homeless – Currently Literally Homeless (sheltered)*

⁵³ Category 3 is ineligible in the Western PA CoC at this time.



3. Imminently At-Risk of Homelessness/HUD Category 2 (if eligible to be served within the project) and would meet Chronically Homeless Definition if Household became homeless
4. Non-Chronic – Severe Needs as Indicated by Assessment (i.e., Higher Score) and Currently Literally Homeless (unsheltered)
5. Non-Chronic – Severe Needs as Indicated by Assessment (i.e., Higher Score) and Currently Literally Homeless (Category 1, sheltered) or Category 4 Homeless
6. Non-Chronic – Currently Literally Homeless or Category 4 Homeless and based on Length of Time Homeless (unsheltered)
7. Non-Chronic – Currently Literally Homeless or Category 4 Homeless and based on Length of Time Homeless (sheltered)
8. Non-Chronic – Imminently At-Risk of Homelessness and based on Length of Time of Previous Homelessness

*The CoC is committed to client-choice but also understands the need to prioritize the limited TH resources in the Continuum. **Therefore, in applying the order of priority, projects filling TH openings should consider the household’s county of preference for priorities 1-2, but will extend their inquiry to the entire CoC (regardless of household choice) for all chronically homeless households prior to moving to priorities 3-9.**

^TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. It will be important for the TH Provider and CE Assessment Center to assist the household in making an informed decision (explaining other services they may be eligible for and what they may forfeit if accepting a TH enrollment and helping the household navigate the likelihood of being connected to these other, potentially more appropriate resources).

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, or Stalking: If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victim sof domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Appendix D).** See **CoC Domestic Violence, Dating Violence, Sexual Assault & Stalking Management Policy (Appendix J).**



Documentation

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

- Executed Occupancy Agreement and any extensions, if applicable

Duration and Amounts

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

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

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

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

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

Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards.

Case Management



Relevant case management standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon Project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy (**Exit Plans- See Templates for CoC and ESG related programs Supplemental Resource**).
- Case Managers offer to meet with participants at least bi-weekly (this stipulation supersedes any language requiring case managers to offer meeting only monthly).

Performance Measures

The CoC has established the following performance goals for TH projects:

- At least 73% of households who exit TH exit to permanent housing. (CoC Monitoring Plan)
- No more than 8% of households that exit to permanent housing after being homeless should become homeless again within 12 months.
- No more than 14% of households that exit to permanent housing after being homeless should become homeless again within 2 years. (CoC Monitoring Plan)
- At least 48% of adults served by TH Projects will increase their income through either employment or benefits; 35% will increase earned income and 20% will increase non-employment income. (CoC Monitoring Plan)
- The Transition Housing Project will have an average stay of 12 months or less (target goal: 9 months or less). (2020 CoC Renewal Scoring)

JOINT TRANSITIONAL HOUSING/RAPID REHOUSING (TH-RRH)

A Joint TH/RRH Component project is a project type that includes two existing project components—TH (TH) and RRH (RRH)—in a single project to serve individuals and families experiencing homelessness. Generally, TH-RRH can be appropriate in areas with low ES housing stock, and emphasis should be on rapid movements from TH to permanent housing (short Length of Stay).

Projects administering Joint TH/RRH projects should defer to the “RRH” and “TH” sections of the CoC’s Written Standards. The areas which deviate from those standards or have additional nuances associated with them for the Joint TH/RRH project type addressed below.

Access



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

Eligibility

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

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

Prioritization

Projects should target and prioritize people experiencing homelessness with higher needs (i.e., multiple barriers to obtaining and retaining housing and/or those who are most vulnerable). A more lenient prioritization may be used if the Joint TH/RRH project exists to fill an emergency placement gap (i.e., the household would remain unsheltered if not for enrollment into the project).

All CoC-funded projects are required to prioritize individuals and families with the longest history of homelessness and with the most severe service needs for all available CoC resources. The determination of severe service needs will be based on the score created from the Coordinated Entry Assessment tool. A higher score demonstrates a higher service need.

Please see “TH” and “RRH” sections related to Order of Prioritization for these project types. TH-RRH projects should follow the Order of Prioritization for TH and RRH projects, depending on which project component participant will be entering.

Documentation

Relevant documentation standards include the information presented in the “RRH,” “TH,” and “Minimum Standards for All Project Types” sections of the CoC’s Written Standards.

Duration and Amounts

The maximum duration of support for both components combined is 24 months per household.

Minimum Standards



All applicable minimum standards are shared in the “RRH,” “TH,” and “Minimum Standards for All Project Types” sections of the Written Standards. Additional minimum standards for this project type include:

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

HMIS/reporting requirements:

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

Case Management

Relevant minimum standards include the information presented in the “RRH,” “TH,” and “Case Management Standards for All Project Types” sections of the CoC’s Written Standards.

Performance Measures

Relevant minimum standards include the information presented in the “RRH” and “TH” sections of the CoC’s Written Standards.

HOMELESS PREVENTION (HP)

Housing stability is the primary goal of HP. ESG funds may be used to provide housing relocation and/or stabilization and services and rental assistance to prevent an individual or family from moving into an ES, safe haven, or other place not meant for human habitation. **ESG HP is not an eviction prevention project.** It is intended to prevent households from losing all housing and ending up in ES or on the street. *Non-ESG-funded prevention projects are encouraged to also follow these standards.*

Access

Households will be screened for prevention resources through CE. If a household is identified at risk of homelessness (per HMIS assessment), CE assessor will refer to prevention providers in their county. These households will NOT be added to the Prioritization List/BNL.



There may be more than one prevention provider in the county (e.g., ESG; PHFA; SSVF HP, etc.). The CE assessor should refer the participant to all prevention resources for which they are eligible. The CE assessor should make every attempt to make a "warm handoff" directly to a prevention provider agency. **Note: CE assessor may be the prevention provider for the county. If so, can make referral within their own agency.*

Upon receipt of referral, prevention providers will screen participants for eligibility. If a prevention provider receives ESG funds or other CoC-issued funding (e.g., Home4Good or PHARE funds) they will use the **Western PA CoC HP Screening Toolkit**⁵⁴ (**Appendix H**) as directed by the CoC. Prevention providers who receive other funding sources are also encouraged to use the Prevention Screening tool.

Participants fleeing DV/attempting to flee DV may be eligible for EITHER HP OR RRH resources, per HUD eligibility guidance (*see note under “Eligibility” section for more information). A DV Assessment Center may make referrals based on participant choice and resource availability. If referral to prevention resources is appropriate, a DV assessment center may make referral to HP resources (including DV-specific resources)

Eligibility

Per the **Western Pa CoC HP Screening Toolkit (Appendix H)**, to be eligible for ESG-funded HP assistance, a household must be screened for and meet each of the eligibility conditions described below. The following categories of individuals or families are eligible for HP services:

- Category 2: Imminent Risk of Homeless; or
 - Category 4: Fleeing/Attempting to Flee Domestic Violence*; or
 - At-risk of homelessness as defined at 24 CFR 576.2⁵⁵;
- AND
- Households must be very-low income: gross annual income must be less than 30% of area median income based on the income limits most recently published by HUD⁵⁶.

Some households who apply for ESG HP assistance may be losing their housing, but they have another safe and appropriate housing option – including temporary options – where they can stay while they work to obtain their own housing. An applicant may also have another resource they

⁵⁴ <https://pennsylvaniacoc.org/resources/western-pa-coc-homelessness-prevention-toolkit>

⁵⁵ <https://www.law.cornell.edu/cfr/text/24/576.2>

⁵⁶ <http://www.huduser.org/portal/datasets/il.html>



can use to maintain current housing or obtain new housing. Such applicants would not be considered at imminent risk of literal homelessness.

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

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

Prioritization

Generally, resources are to be prioritized for households who would otherwise be on the streets or in an ES. In general, prevention projects should utilize the following Order of Prioritization, in addition to using the Western PA HP Screening Form as outlined below.

Order of Prioritization for HP Projects:

1. Category 2 - Homeless with a court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance
2. Category 2, 3, or 4 Homeless
3. At-risk of homelessness as defined at 24 CFR 576.2⁵⁷;

HP Providers should identify households, through both CE and direct referrals, and prioritize these households by utilizing the **Western PA CoC HP Screening Toolkit (Appendix H)**.

The HP Screening Toolkit is designed to help staff assess, document, and determine whether a household applying for HP assistance meets the eligibility requirements (stage 1) mentioned above and meets the established prioritization criteria (stage 2). To be prioritized, applicants must meet the established threshold targeting score (15+) that prioritizes those most at risk of becoming literally homeless, in the event there are not sufficient resources to assist all eligible households.

⁵⁷ <https://www.law.cornell.edu/cfr/text/24/576.2>



- All applicants who meet Stage 1 eligibility must then be screened using the targeting conditions and threshold point system described in Stage 2. Points have been assigned to factors based on research and practical experience. Stage 2 screening provides grantees with a standardized tool for determining how to prioritize eligible households for ESG HP assistance based on:
 - 1) urgency of the applicant’s current housing situation; and
 - 2) other barriers and vulnerabilities that may impact their ability to quickly secure housing and resolve literal homelessness independently if they are not assisted and become literally homeless.
- Stage 2 screening is critical when an ESG Project does not have sufficient resources or capacity to provide HP services to every household that meets Stage 1 eligibility and could become literally homeless. The targeting threshold score for ESG HP is 15+.
- Households who meet Stage 1 eligibility requirements but do not score at or above the established targeting threshold score should be identified as “Does Not Meet Targeting Threshold” in Stage 2. These households may receive only “Light Touch” ESG services (i.e., 30 days case management), which do not include temporary financial assistance. These households should be enrolled in the ESG project and tracked within HMIS.
 - Targeted Assistance Recommendations, per the HP Screening Toolkit:
 - 15-25 Points: Short-term Assistance
 - 26+ Points: Medium-term Assistance

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, or Stalking: If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victim sof domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Appendix D)**. See **CoC Domestic Violence, Dating Violence, Sexual Assault & Stalking Management Policy (Appendix J)**.

Documentation

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



- For ESG-funded HP, the **Documentation of Homelessness Checklist (See Templates for CoC and ESG related programs Supplemental Resource)** must be completed and uploaded into HMIS prior to enrollment of a household into an HP project.
- For ESG-funded HP, an executed **Landlord-agency Agreement (See Templates for CoC and ESG related programs Supplemental Resource)** must be on file. Projects must offer a standard, basic level of support to all landlords who lease to project participants as detailed in a written agreement that should be signed by the Case Manager or Housing Locator and the landlord. At a minimum, this agreement should specify that the Case Manager and/or Housing Locator will:
 - Inform the landlord about the amount and duration of financial assistance being provided to the participant;
 - Respond quickly (ideally within one business day) to landlord calls about serious tenancy problems;
 - Seek to resolve conflicts around lease requirements, complaints by other tenants, and timely rent payments; and,
 - If necessary, help negotiate move-out terms and assist the participant to quickly locate and move into another unit without an eviction.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The **Lease (see example in Templates for CoC and ESG related programs Supplemental Resource)** must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
 - Signatures of both parties.
- Other documents required in all case files:
 - Passed Inspections (Minimum Habitability Standards and Lead-Based Paint)- Note: for ESG-funded HP, the passed inspection must be dated BEFORE the lease and landlord-agency agreement are dated and executed. For rental arrears, the date of the lease needs to be before the inspection.
 - **Housing Stability Plans (See Templates for CoC and ESG related programs Supplemental Resource)** are required and must include **information on financial assistance (See Templates for CoC and ESG related programs Supplemental Resource)** provided to the participant. HP Case Managers should



work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.

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

Duration and Amounts

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

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

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



months, the case manager is to seek approval from the CoC at 12, 15, 18, and 21 months if needed (**See Approval Template in Templates for CoC and ESG related programs Supplemental Resource**). Reasonable extension justifications include serving:

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

In no instances will a household receive more than 24 months of prevention assistance in any 3-year period, and no fees can be imposed on project participants beyond payment of rent.

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

- Rental or utility arrearages of up to 6 months may be paid if doing so will stop an eviction and prevent homelessness. The total arrearages may be more, in which case, additional funds can be used, or the landlord may opt to forgive that debt or create a repayment plan with the household.
- First month's rent after enrollment can be offered in full to assist the household. In the event the first month is prorated, the first full month may also be paid in full, if commensurate with the household's need, and, in the event the household relocated, security deposits cannot exceed 2 months of actual rent.
- Unit rent may not exceed either FMR or Rent Reasonableness.
- Additional costs may be covered to assist households enrolled in HP, but projects should refer to their actual grant application guidelines applicable to the contract year(s) they are funded for.

Minimum Standards

Relevant minimum standards include the information presented in the "Minimum Standards for All Project Types" section of the CoC's Written Standards. Additional minimum standards for this project type include:

- Income is reassessed quarterly for the purposes of eligibility and adjusting rental payments. Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Some indicators of stability could be:
 - Goals cited in previously created goal plans will be realized.



- The household will be paying rent in full (or to the level agreed upon as described above)
- The housing crisis is resolved
- The household feels as though they have enough support in place to maintain stabilization without ESG's essential services.

Case Management

Relevant case management standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy (**Exit Plan- See Templates for CoC and ESG related programs Supplemental Resource**)
- Working with households to develop a Housing Stability Plan that includes review of the affordability of the household’s housing unit and the possibility of moving to a more affordable living situation. (**See Templates for CoC and ESG related programs Supplemental Resource for Housing Stability Plan Template**)
 - The Housing Stability Plan should be reviewed monthly and revised every 3 months

Performance Measures

Although CoC-wide performance measures do not exist for this project type, projects are required to submit project-level measures/benchmarks with ESG applications and should refer to what they stated in their applications.

EMERGENCY SHELTER (ES)

An ES is any facility, the primary purpose of which is to provide a temporary shelter for households experiencing homelessness and which does not require occupants to sign a lease or occupancy agreement. The goal for all ES’s is to exit households to permanent housing as quickly as possible. Upon admission to ES, all households should be entered into CE to expedite exit to permanent housing resources. It is the CoC’s goal that all ES, regardless of funding source, will follow the CoC’s written standards. *Non-ESG-funded ESs are encouraged to also follow these standards.*

Access



ES may accept participant referrals from CE, other agencies, or from the participants themselves (i.e., self-referral/participant reaches out for services).

Shelter intake staff should explore all options prior to enrolling a household in ES, including problem-solving conversations, identifying community supports, and offering lighter touch solutions.

There should be coordination among those operating prevention Projects, including ESG, HAP, HOME4Good, PHARE, ESG-CV, etc.

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

Eligibility

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

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

To the maximum extent possible, shelters should avoid discharging guests except when the guest poses a danger to themselves or other shelter residents. ES *may* deny entry or future stays only for the reasons listed below. In these situations, alternative shelter must be identified.

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

Prioritization



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

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, or Stalking: If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victim sof domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Appendix D)**. See **CoC Domestic Violence, Dating Violence, Sexual Assault & Stalking Management Policy (Appendix J)**.

Documentation

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

- Completing and uploading the **Documentation of Homelessness Checklist and homeless documentation (See Templates for CoC and ESG related programs Supplemental Resource)** to HMIS prior to enrollment of a household into ESG-funded Projects.
- Completing the **Homeless Certification (See Templates for CoC and ESG related programs Supplemental Resource)** to be used when coordinating with a permanent housing provider.
- Working with participants to obtain their necessary documentation, if applicable (i.e., Social Security cards, birth certificates, chronic status verification, etc.). These efforts would be documented in the case files along with any additional case notes.

Duration and Amounts

The CoC has not established a maximum length of stay in ES. However, the goal is for households to remain in shelter for the shortest time possible in accordance with the CoC’s Strategic Plan. The CoC has established a goal that households should move into permanent housing within an average of 29 days by 2021. Shelters should provide flexibility related to length of stay based on individual needs, recognizing factors that may necessitate a longer length



of stay such as awaiting housing through the CoC's CE process. Shelters should maintain a housing-focused approach when working with participants.

ES should not charge fees to participants.

Minimum Standards

Relevant minimum standards include the information presented in the "Minimum Standards for All Project Types" section of the CoC's Written Standards. Additional minimum standards for this project type are:

- Engaging participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement back into permanent housing.
- Discharging, to the greatest extent possible, to a permanent housing resource.
- Operating in compliance with The Final Rule for Equal Access in HUD Projects.
 - Family shelters must serve all family compositions.
 - Persons must be accepted into shelters in accordance with the gender with which they identify and present themselves.
- Making it known that use of the facilities and services are available to all on a nondiscriminatory basis.
- ES that serve families with children are prohibited from denying assistance to or separating members of a family with children based on gender or age.
- To the extent possible, ES should have 24/7 hours of operation.
- ES should operate with a low-barrier approach, to the maximum extent possible. This includes:
 - People do not have to line up for a bed each night or leave early in the morning
 - No drug and alcohol testing to get in
 - Not requiring identification documents to get in (and assist participants once they are in shelter to obtain these documents)
 - No criminal background checks to get in
 - Not requiring income to get in
 - Not requiring "housing-readiness" to get in
 - Accepting all family configurations, if shelter provides services to families
 - Accepting couples, if shelter provides services to singles
 - Not requiring participation in services to remain in the shelter. Shelters should offer and encourage participation in services; however, shelters should not mandate services as a requisite for remaining in the shelter.



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

Case Management

Relevant case management standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon project entry with regular discussions about moving towards permanent housing.
- Shelter staff should conduct an initial service assessment within 7 days of intake, prioritizing emergency service needs and referral to CE, then coordinating/providing services most crucial to housing attainment. Reassessments should be conducted weekly until discharge.

Performance Measures

The CoC has established the following performance goals for ES:

- Households should move into permanent housing within an average of 29 days. (CoC Strategic Plan)
- At least 47% of households who exit ES exit to permanent housing. (CoC Monitoring Plan)
- No more than 14% of households that exit to permanent housing after being homeless should become homeless again within 12 months. (CoC Monitoring Plan)
- No more than 19% of households that exit to permanent housing after being homeless should become homeless again within 2 years. (CoC Monitoring Plan)



STREET OUTREACH (SO)

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

Access

Outreach workers are able to enroll households across the community, outside office walls, engaging with participants early and often.

Eligibility

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

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1

AND

- Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in ES

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

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

Prioritization

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

Documentation



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

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

Duration and Amounts

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

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

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

Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards. Additional minimum standards for this project type include:

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

Case Management

Relevant case management standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Outreach staff should establish trust with the individuals or families identified through outreach focusing on building positive relationships, including creating a safe presence and initiating non-threatening conversation.
- Engagement activities should include an initial assessment of needs and eligibility in order to prioritize the type and source of assistance required, prioritizing safety and urgent health needs.
- Outreach staff should conduct an assessment to identify and prioritize those services for which individuals/families identified through outreach are eligible, including: case



management; food sources; transportation; employment; early learning and education services; emergency health services; emergency mental health services; and essential services tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are living unsheltered.

- To the greatest extent possible, outreach staff completes the CE Assessment “out in the field”, enroll participants in the outreach Project for as long as needed (if that is the individual's choice), and hand off eligible households to longer term assistance Projects (such as permanent housing, RRH, or another appropriate permanent housing option).
- Outreach staff should link unsheltered individuals to a place to get warm, address/provide basic survival items and provide assistance with accessing benefits, services, and housing.
 - Services should include linking participants to mainstream benefits and resources, including behavioral health and intellectual disability services
- Services should be targeted to assisting households with attaining housing stability as quickly as possible.
- Participants should be linked to additional services by way of a warm hand off to the greatest extent possible.

Performance Measures

The CoC has established the following performance goals for SO:

- At least 73% of households served under a SO Project will exit to housing of their choice.

For more information on suggested SO implementation ideas please refer to: **USICH Core Elements of Effective SO to People Experiencing Homelessness**⁵⁸.

SUPPORTIVE SERVICES ONLY (SSO)

CoC-funded SSO projects (*not including SSO-CE projects for CE, which are addressed in the “CE” project section*), provide services to persons experiencing homelessness that are not tied to specific housing units. Those implementing this project type should help people relocate from unsheltered locations into somewhere safe as quickly as possible.

Note: CoC-Funded SO Projects funded under SSO and ESG-funded SO are covered in the “SO” section of the CoC’s Written Standards.

⁵⁸ https://www.usich.gov/resources/uploads/asset_library/Core-Components-of-Outreach-2019.pdf



Access

Staff are able to enroll households outside the office walls, engaging with participants early and often.

Eligibility

The following categories of individuals or families are eligible for SSO projects:

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

Prioritization

Those who are unsheltered are to have an expedited enrollment to the greatest extent possible over anyone who is sheltered.

Documentation

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

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

Duration and Amounts

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

There should be repeated attempts to engage and assist households, while respecting client choice.

Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards.

Case Management



Relevant case management standards include the information presented in the “Minimum Standards for All Project Types” and “SO” sections of the CoC’s Written Standards. Additional case management standards for this project type include:

- Supportive services must focus on assisting participants in obtaining housing and engage participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement back into permanent housing.
- Services should include linking participants to mainstream benefits and resources, including behavioral health and intellectual disability services.
- Case management services should be targeted to assisting households with attaining housing stability as quickly as possible.
- Participants should be linked to additional services by way of a warm hand off to the greatest extent possible.

Performance Measures

The CoC has established the following performance goals for SO:

- Households served in SSO Projects should move into permanent housing within an average of 30 days or less. (CoC Monitoring Plan)

COORDINATED ENTRY (SSO-CE)

These standards apply to CE Assessment Staff (Assessors) and Assessment Centers who are operating as part of the CES.

Access

Individuals and households may access CE services in-person at an assessment center, or via phone as available. Phone access should be available 24/7. Assessment centers should strive to ensure accessibility for all participants. See **CoC Fair and Equal Access Policy (Appendix I)** for more information on accessibility.

Eligibility

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness



- Category 3: Homeless Under Other Federal Statutes⁵⁹
- Category 4: Fleeing/Attempting to Flee Domestic Violence

Prioritization

Assessment Center Staff should follow the CoC Written Standards for prioritization of enrollments based on project type.

Documentation

Assessors utilize HMIS to gather and document pertinent information, including pre-screening interview questions, demographic information/HUD Universal Data Elements, and assessment information.

Duration and Amounts

Please see **CE Policies and Procedures** (<https://pennsylvaniacoc.org/balance-statewestern-pa-coc/western-pa-coc-coordinated-entry-committee>) for information on BNL management, ongoing client eligibility, and closures from the BNL.

Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards. In addition, SSO-CE Projects will abide by the following standards and policies:

- **Fair and Equal Access Policy**
 - The Western PA CoC will ensure fair and equal access to the CE system projects and services for all consumers regardless of actual or perceived race, color, religion, national origin, age, gender identity, pregnancy, citizenship, familial status, household composition, disability, Veteran status, sexual orientation, or domestic violence status.
 - To ensure fair access by individuals with disabilities, physical and communication accessibility barriers must be addressed by appropriate accommodation within the CES.
 - All authorized user agencies who enter into a Memorandum of Understanding (MOU) for CE agree to take full responsibility for complying with Fair Housing and all other funding and project requirements. If an individual’s self-identified

⁵⁹ While Category 3 individuals are ineligible for most homeless assistance resources in the Western PA CoC at this time, these individuals may still be assessed through CES and referred to other eligible resources.



gender or household composition creates challenging dynamics among residents within a facility, the host project is required to make every effort to accommodate the individual or assist in locating alternative accommodation that is appropriate and responsive to the individual's needs.

- See **Appendix I for CoC Fair and Equal Access Policy.**
- **Creation of Nondiscrimination and Fair Housing Policies** All provider agencies, including assessment centers, are required to uphold and provide to the Western CoC designated Lead Agency of CE with the following:
 - Verification that they have policies which ensures the agency does not tolerate discrimination and comply with all nondiscrimination, fair housing, and equal opportunity laws.
 - Verification of availability of aids and services, upon request, to ensure effective communication, such as the availability of qualified sign language interpreters, documents in Braille, or other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.
 - Verification that a project has a reasonable accommodation policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
 - If the agency acts as a landlord, verification that the agency has a reasonable modification policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
 - Verification that the agency has a complaint procedure to provide the project participant to report discrimination .
 - **See Appendix B for CoC Non-Discrimination and Affirmative Fair Housing Policy**
- **Domestic Violence, Dating Violence, Sexual Assault and Stalking Management Policy** The CES will abide by the following requirements:
 - All persons who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, human trafficking, or stalking shall expect and receive safe, confidential access to the CE Process including immediate access to the emergency services necessary for their safety including, but not limited to, the domestic violence hotlines, shelter, safety planning and housing when possible.
 - These persons shall remain anonymous within HMIS assessment tool and during the initial assessment processes.
 - Safety and Confidentiality Training shall be provided at least annually to both General Assessment Centers and Domestic Violence Assessment Centers to ensure that safety is in the forefront during assessment and housing determination periods.
 - Well documented and laid out consent forms will be required for each phase of the assessment process.



- See **Appendix J for CoC Domestic Violence, Dating Violence, Sexual Assault & Stalking Management Policy.**

Performance Measures

The CES Committee has selected the following as key outcomes for CES:

- Reduction in the length of time homeless (system and project level). Average length of time homeless for persons in emergency shelter from 9/1/18-10/30/19 for Western PA CoC was 41 days.
- Reduction in the number of persons experiencing first-time homelessness (system and project level). Number of persons experiencing first-time homelessness in Western PA CoC (number of persons entering ES, TH, and PH placements with no prior enrollments in HMIS) was 2,144 persons.
- Increase in percentage of placements into permanent housing (system and project level). Percentage of enrollments/placements into housing through Coordinated Entry from 1/1/19-12/31/19 was 44% for households with children and 39% for households without children.

The CES Call Center and Access Site performance standards include:

- Percent of responding participants were satisfied with CE as measured by Customer Satisfaction question/s asked as part of the annual survey. Satisfaction surveys will be distributed to persons receiving services through the CES, agencies who are utilizing CE to fill vacancies, assessment centers, and community partners as part of CE evaluation process.
- Percent of complete PA HMIS CE Data (all questions answered unless participant refuses). Goal: 100%



Appendices



APPENDIX A: HUD REQUIREMENTS FOR WRITTEN STANDARDS

HUD's Requirements for Written Standards

Both the CoC and ESG Interim Rules identify specific requirements for Written Standards for programs that utilize these funds. The following are required to be included in the CoC's Written Standards:

Continuum of Care (CoC) Funded Projects – Required Written Standards

The following are the requirements for Written Standards for Continuum of Care (CoC) Funded Projects per 24 CFR Part 578: The Homeless Emergency Assistance and Rapid Transition Interim Rule.

578.7(a)(9) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

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

Emergency Solution Grant (ESG) Funded Projects – Required Written Standards

The following are the requirements for Written Standards for Emergency Solution Grant (ESG) Funded Projects per 24 CFR Part 576(3): Emergency Solutions Grants Program Interim Rule:

Applicable to ALL ESG program types:

- (i) Standard policies and procedures for evaluation of individuals' and families' eligibility under ESG
- (v) Coordination with the below referenced programs and resources is required of all ESG funded programs:
 - Coordination with other targeted homeless services: Per 24CFR576.400(b) ESG funded programs are required to coordinate with other programs targeted to people experiencing homelessness in the area covered by the CoC to provide a strategic, community-wide system to prevent and end homelessness for the CoC. A list of these programs is provided in **Appendix A**.
 - System and program coordination with mainstream resources: Per 24 CFR576.400(c) ESG funded programs are required to coordinate to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for households experiencing homelessness or at risk of homelessness. Examples of these programs are provided in **Appendix A**.

Applicable to HOMELESSNESS PREVENTION AND RAPID REHOUSING:

(vi) Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

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

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

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

Applicable to EMERGENCY SHELTERS:

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

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

Applicable to STREET OUTREACH:

(II) Standards for targeting and providing essential services to street outreach



APPENDIX B: CoC NON-DISCRIMINATION AND AFFIRMATIVE FAIR HOUSING POLICY

WESTERN PA CONTINUUM OF CARE (PA – 601)
Non-Discrimination and Affirmative Fair Housing Policy

CE must be capable of meeting or exceeding CoC Policies on Nondiscrimination, Fair Housing, and Accessibility. Must be able to move people onto and off of the By Name List as required for programming needs. Must be able to adjust living situation and prioritization scoring as required.

Nondiscrimination

24 CFR §578.93(a) requires CoC Programs to operate in compliance with federal nondiscrimination and equal opportunity requirements; see 24 CFR 5.105 (a) for a full list of applicable laws, regulations and Executive Orders.

Fair Housing

The Fair Housing Act prohibits discrimination in housing on the basis of:

- Race
- color
- National origin
- Religion
- Sex
- Familial status (families with children)
- Disability

Additionally, each program, needs to address their state, local and municipality requirements regarding fair housing rules and regulation.

Reasonable Accommodations and Modification for Persons with Disabilities

Persons with disabilities may be entitled to reasonable accommodation and/or modifications. A request for reasonable accommodation must be made by or on behalf of a person with a disability. The request must be necessary i.e. there must be a disability related need for the reasonable accommodation or modification. In addition, the request must be reasonable. i.e. cannot impose an undue financial and administrative burden on the housing provider or fundamentally alter the nature of the provider's operations. The Act makes it unlawful to refuse to make reasonable accommodations to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling. The Act also makes it unlawful for a housing provider or homeowners' association to refuse to allow a reasonable modification to the premises when such a modification may be necessary to afford persons with disabilities full enjoyment of the premises.

A "reasonable accommodation" is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces.

A “reasonable modification” is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas.

A “disability” is defined as (1) individuals with a physical or mental impairment that substantially limits one or more major life activities; OR (2) individuals who are regarded as having such an impairment; OR (3) individuals with a record of such an impairment.

- The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, Human Immunodeficiency Virus infection, mental retardation, emotional illness, drug addiction (other than addiction caused by current, illegal use of a controlled substance) and alcoholism.
- The term “substantially limits” suggests that the limitation is “significant” or “to a large degree.”
- The term “major life activity” means those activities that are of central importance to daily life, such as seeing, hearing, walking, breathing, performing manual tasks, caring for one’s self, learning, and speaking. This list of major life activities is not exhaustive

Required Documentation

A provider is entitled to obtain information that is necessary to evaluate if a requested reasonable accommodation may be necessary because of a disability. If a person's disability is obvious, or otherwise known to the provider, and if the need for the requested accommodation is also readily apparent or known, then the provider may not request any additional information about the requester's disability or the disability-related need for the accommodation.

If the requester's disability is known or readily apparent to the provider, but the need for the accommodation is not readily apparent or known, the provider may request only information that is necessary to evaluate the disability-related need for the accommodation.

If the requesters disability is not obvious or the need for the request is not obvious, a housing provider may request reliable disability-related information that (1) is necessary to verify that the person meets the Act's definition of disability (*i.e.*, has a physical or mental impairment that substantially limits one or more major life activities), (2) describes the needed accommodation, and (3) shows the relationship between the person's disability and the need for the requested accommodation.

Guidance for Creation of Nondiscrimination and Fair Housing Policies: All provider agencies, including assessment centers are required to uphold and provide to the Western CoC designated Lead Agency of Coordinated Entry with the following:

- Verification that they have policies which ensures the agency does not tolerate discrimination and comply with all nondiscrimination, fair housing, and equal opportunity laws.
- Verification of availability of aids and services, upon request, to ensure effective communication, such as the availability of qualified sign language interpreters, documents in Braille, or other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.
- Verification that a program has a reasonable accommodation policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
- If the agency acts as a landlord, verification that the agency has a reasonable modification policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
- Verification that the agency has a complaint procedure to report discrimination to be provided to and/or provided to program participant. The contact information should include the following:

Point of Contact Information from the Provider Agency:

Fair Housing Law Center

Attention: Southwestern PA Legal Services, Inc.
10 West Cherry Avenue, Washington, PA 15301
(877) 725 - 4472

US Department of Housing and Urban Development
10 Causeway Street, Room 321
Boston, Massachusetts 02222-1092
(617) 994-8300; (800) 827-5005; TTY (617) 565-5453

Affirmatively Furthering Fair Housing

24 CFR § 578.93(c) requires that CoC Programs must affirmatively market housing and supportive services to eligible persons--regardless of race, color, national origin, religion, sex, age, familial status, or handicap--who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities. To ensure the coordinated entry process assists CoC Program and ESG Program recipients in meeting the Affirmatively Furthering Fair Housing requirement, Western PA CoC is committed to providing marketing resources, auxiliary aids and other services necessary to ensure effective communication with persons accessing the homeless response system, which includes ensuring that information is provided in appropriate accessible formats as needed, such as Braille, audio, large type, assistive listening devices, and sign language interpreters, as well as accommodation for persons with limited English proficiency. Resources will be developed and made available by the CoC designated Lead Agency and marketing plans described within the Coordinated Entry Policy and Procedure Manual. Housing assisted by HUD and made available through the CoC must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2).

Resources

HUD template for creation of Affirmative Fair Housing Marketing Plan (HUD Form 935.2a):

Multi-Family Housing: <http://portal.hud.gov/hudportal/documents/huddoc?id=935-2a.pdf>

Single Family Housing: <https://www.hud.gov/sites/documents/935-2B.PDF>



APPENDIX C: CoC ACCESS/BARRIERS POLICY

Western Pa Continuum of Care (PA -601)
Access/ Barriers Policy

HUD Coordinated Entry Notice: Section 11.B.4

Background

Housing First is an approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements and in which rapid placement and stabilization in permanent housing are primary goals. CoC and ESG funded projects that use a Housing First approach promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services. United States Department of Housing and Urban Development (HUD) encourages all recipients of Continuum of Care (CoC) Program to follow a Housing First approach to the maximum extent practicable. Any recipient that indicated they would follow a Housing First approach in their CoC Project Application must do so throughout the full grant term of any funded application.

Applicability

At minimum, all CoC- funded Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), and Transitional Housing (TH) programs will maintain marketing and tenant selection policies and procedures that follow a Housing First approach as noted below.

Policy

The Pennsylvania Western Region Continuum of Care requires agencies and programs alike to have the following core elements incorporated in all program types:

- Admission/tenant screening and selection practices promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, and participation in services.
- Applicants may not be rejected by agencies on the basis of poor credit or financial history, income, poor or lack of rental housing, minor criminal convictions, or behaviors that indicate lack of “housing readiness.”
- Providers accept referrals directly from shelters, street outreach, drop-in centers, and other parts of crisis response systems that are integrated into Coordinated Entry, and are frequented by vulnerable people experiencing homelessness.
- Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly tenant-driven without predetermined goals. Participation in services or program compliance is not a condition of permanent supportive housing. Rapid Re-Housing programs may require case management as condition of receiving rental assistance.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered reason for eviction by the Agency. Receiving approval from the CoC, agencies may adopt a “no use or consumption” on property rule.



APPENDIX D: WESTERN PA CoC CONTINUUM OF CARE EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT OR STALKING

Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

The Western PA CoC is concerned about the safety of participants in homeless assistance programs, and such concern extends to participants who are victims of domestic violence, dating violence, sexual assault, or stalking.

In accordance with the Violence Against Women Act (VAWA),¹ Western PA CoC homeless assistance programs providing housing or rental assistance must allow participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant's current unit to another unit. This requirement applies to programs receiving Continuum of Care (CoC) funding, as well as DCED Emergency Solutions Grant (ESG) funding, in accordance with DCED policies and requirements.

The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² CoC/ESG providers will work with the Western PA CoC's Coordinated Entry System to enact an emergency transfer through resources beyond those available within the provider's own organization. The ability of the Western PA CoC's Coordinated Entry System to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether another dwelling unit is available and is safe to offer the participant for temporary or more permanent occupancy.

This plan identifies participants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to participants on safety and security. This plan is based on a model emergency transfer plan published by HUD, which is the Federal agency that oversees VAWA compliance of CoC/ESG-funded programs.

Eligibility for Emergency Transfers

A participant is eligible for an emergency transfer when any member of the household is a victim of domestic violence, dating violence, sexual assault, or stalking, and reasonably believes

¹ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the participant shall notify their housing provider/ case manager and submit a written request for a transfer to that provider. The provider must provide reasonable accommodations to this policy for individuals with disabilities. The participant's written request for an emergency transfer should include either:

1. A statement expressing that the participant reasonably believes that there is a threat of imminent harm from further violence if the participant were to remain in the same dwelling unit assisted under the provider's program; OR
2. A statement that the participant, or a member of the participant's household was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the participant's request for an emergency transfer.

Confidentiality

The housing provider and the Western PA CoC's Coordinated Entry System will keep confidential any information that the participant submits in requesting an emergency transfer, and information about the emergency transfer, unless the participant gives the housing provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the program. This includes keeping confidential the new location of the dwelling unit of the participant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the participant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Participants for more information about the provider's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

While the provider cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request, the provider must act as quickly as possible to move a participant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit, either within the provider's own

inventory or through a transfer facilitated through the Western PA CoC's Coordinated Entry System.

If a participant reasonably believes a proposed transfer would not be safe, the participant may request a transfer to a different unit. If a unit is available, the transferred participant must agree to abide by the terms and conditions that govern occupancy in the unit to which the participant has been transferred. Neither the provider, nor the the Western PA CoC's Coordinated Entry System Liaison may be able to transfer a participant to a particular unit if the participant has not or cannot establish eligibility for that unit.

At the participant's request, the housing provider will also assist participants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Protocol for transfer request

If the provider cannot transfer the participant through resources operated by/ available through their own organization, the housing provider or case manager will need to contact the Coordinated Entry Liaison to request assistance. The Coordinated Entry Liaison will work quickly, following the protocol outlined in the Coordinated Entry Policies and Procedures manual in order to assist the housing provider to identify an alternate safe unit.

Safety and Security of Participants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the participant is urged to take all reasonable precautions to be safe.

Participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Participants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Participants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Attachment: Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

List of Domestic Violence organizations in each county of the Western PA CoC

County	Hotline	Domestic Violence Program Name
Armstrong	800-841-8881	HAVIN, Inc.
Butler	800-400-8551	Victim Outreach Intervention Center
Cameron	800-226-4759	C.A.P.S.E.A
Clarion	800-992-3039	SAFE (Stop Abuse For Everyone)
Clearfield	800-598-3998	Community Action, Inc./Crossroads Project
Crawford	888-881-0189	Women's Services, Inc.
Elk	800-226-4759	C.A.P.S.E.A
Fayette	800-791-4000	Domestic Violence Services of Southwestern PA, Inc.
Forest	800-338-3460	A Safe Place, Inc.
Greene	800-791-4000	Domestic Violence Services of Southwestern PA, Inc.
Indiana	800-435-7249	Alice Paul House
Jefferson	800-598-3998	Community Action, Inc./Crossroads Project
Lawrence	724-652-9036	Crisis Shelter of Lawrence County
McKean	888-822-6325	YWCA Victims' Resource Center
Mercer	888-981-1457	AWARE
Potter	877-334-3136	A Way Out
Venango	800-243-4944	PPC Violence Free Network
Warren	800-338-3460	A Safe Place, Inc.
Washington	800-791-4000	Domestic Violence Services of Southwestern PA, Inc.
Westmoreland	888-832-2272	Blackburn Center

Sexual Assault organizations in PA

For a list of organizations/locations that can provide assistance to victims of sexual assault, visit online - <http://www.pcar.org/help-pa/locations>



APPENDIX E: WESTERN PA CoC PROGRAM TRANSFER POLICIES AND PROCESS

Western PA CoC Program Transfer Policies & Process

A sound and successful housing system takes into account the need for transfers between program types to better meet the preferences and needs of a household. A key component to any transfer process is an on-going assessment of a household to determine whether the levels of service are appropriate or need to be increased or reduced.

One by One's (Western PA CoC's) program transfer policies are focused on providing a flexible strategy to structure assistance to meet a household's needs.

Transfers are not appropriate for reasons related to protected class status only, including race, color, national origin, religion, sex, disability, age, genetic information, marital status, sexual orientation, gender identity, and being a member of a local human rights commission.

Emergency Transfer for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking

One by One is concerned about the safety of participants in homeless assistance programs, and such concern extends to participants who are victims of domestic violence, dating violence, sexual assault, or stalking.

Please see the *Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* for more information, including the procedure for completing an Emergency Transfer.

Transfers between Programs within the Same Program Model

When a current household must transfer to another program within the same program model (e.g. PSH to PSH), the provider should prioritize the household for resources operated by/available through their own organization.

In the event that the provider cannot transfer the client internally, they should complete a *Transfer Request Form* and follow the instructions provided on the form.

Transfers from One Program Model to Another (RRH to PSH)

Rapid re-housing is a model for helping individuals and families who are experiencing homelessness to obtain and maintain permanent housing. As our Coordinated Entry System prioritizes the most vulnerable households for any eligible assistance, there may be times when a transfer to PSH would be the more appropriate housing intervention strategy.

Program transfers may be made from rapid re-housing or transitional housing to permanent supportive housing so long as the household meets the eligibility criteria under the specific program and the requirements for the Permanent Supporting Housing project in the Notice of Funding Availability (NOFA) for the year the project was awarded.

Please note: RRH providers are expected to gather all information necessary to determine if a household meets the chronic homeless definition (disability information and verification of

homelessness) within 45 days of program enrollment. These documents should be uploaded to the global client documents within ClientTrack. Failure to do so will not allow for these households to receive the necessary additional priority for being chronically homeless for transfers.

Appendix A of the Program Transfer Policies & Process includes sample documentation which can be used to collect this information. Additional training is available by request.

All transfers from one program model to another must begin with the completion of the *Transfer Request Form* and should follow the directions provided on the form.

Prioritization within the Coordinated Entry System

The following represents the priority order for how open PSH slots are filled within our Continuum. These align with CPD-14-012 and CPD-16-11 and match the directions provided under the Coordinated Entry policies.

- 1) Chronically Homeless – Currently Literally Homeless*
- 2) Chronically Homeless – Needing a PSH to PSH Transfer (Chronic Status Documented by Current Provider within 45 days of Current Program Enrollment)*
- 3) Chronically Homeless – Needing a RRH to PSH Transfer (Chronic Status Documented by Current Provider within 45 days of Current Program Enrollment)*
- 4) Non-Chronic – Severe Needs as Indicated by Assessment (PSH Intervention Recommended) and Currently Literally Homeless
- 5) Non-Chronic – Severe Needs as Indicated by Assessment (PSH Intervention Recommended) and Currently Needing PSH to PSH Transfer
- 6) Non-Chronic – Severe Needs as Indicated by Assessment (PSH Intervention Recommended) and Currently Needing RRH to PSH Transfer
- 7) Non-Chronic – Currently Literally Homeless and based on Length of Time Homeless
- 8) Non-Chronic – PSH to PSH Transfer based on Length of Time Homeless
- 9) Non-Chronic – RRH to PSH Transfer based on Length of Time Homeless
- 10) Non-Chronic – Needing a TH to PSH Transfer and Household was Chronically Homeless at Program Entry (Chronic Status Documented by Current Provider within 45 days of Current Program Enrollment)^
- 11) Non-Chronic – Needing TH to PSH Transfer based on Severe Needs as Indicated by Assessment (PSH Intervention Recommended)^
- 12) Non-Chronic – Needing TH to PSH Transfer based on Length of Time Homeless^

*One by One is committed to client-choice but also understands the need to prioritize the limited PSH resources in the Continuum. **Therefore, in applying the order of priority, programs filling PSH openings shall complete Service Inquiries using the household's county of preference for priorities 1-3, but will extend their inquiry to the entire CoC (regardless of household choice) for all chronically homeless households prior to moving to priorities 4-12.**

^While TH to PSH transfers are eligible under the order of priority, TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. Therefore, TH residents will not be prioritized for PSH transfers under this policy.

Transfer Request Form

While it may be possible to transfer a household between programs with the same model, or from RRH to PSH, it generally cannot be done immediately and often depends upon PSH availability. In order to determine whether a household qualifies for a transfer and for guidance on next steps, please complete the following form. **Emergency Transfers should follow the *Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking*.**

Client ID #: [Click or tap here to enter text.](#)

Organization Name: [Click or tap here to enter text.](#)

Program Name: [Click or tap here to enter text.](#)

Program Case Manager Contact Information: Name: [Click or tap here to enter text.](#)

Email: [Click or tap here to enter text.](#)

Phone: [Click or tap here to enter text.](#)

Date Enrolled in Current Program: [Click or tap here to enter text.](#)

Date Housed in Current Program: [Click or tap here to enter text.](#)

Date of Transfer Request: [Click or tap here to enter text.](#)

1. **Type of Transfer Requested:** PSH to PSH Transfer RRH to PSH Transfer

2. **Reason for Transfer (check all that apply. Boxes marked required must be checked for household to be eligible for a transfer):**

The household needs financial assistance only.  This household is not eligible for a transfer
(NOT ELIGIBLE)

Service needs cannot be met in current program **(REQUIRED)**

Needs of the household have changed since program entry, or the understanding of the households' needs have changed since program entry **(REQUIRED)**

Current housing unit is inappropriate

Client is being discharged from current RRH program

Client is being discharged from current PSH program

3. **Requirements for Transfer (All requirements below must be met for household to be eligible for a transfer):**

Services/interventions have been provided and offered to improve the household's stability in the current project

The household has been consulted about moving programs, and has agreed to switch programs

RRH to PSH Transfer Only: The household has been extended in the current RRH program, or, they are within 3 months of being timed-out from the current RRH program. *N/A for PSH to PSH transfer*



APPENDIX F: PA HMIS COLLABORATIVE CLIENT CONSENT

PA HMIS Collaborative Client Consent

Release of Information via PA HMIS

The Pennsylvania Homeless Management Information System (“PA HMIS”) serves the Pennsylvania Continuums of Care Collaborative, a group of agencies (“PA HMIS Participating Agencies”) working together to provide services to individuals and families in Pennsylvania who are homeless or at risk of becoming homeless. In an effort to end homelessness, PA HMIS allows the Commonwealth of Pennsylvania and PA HMIS Participating Agencies to use this system to efficiently collaborate, identify, coordinate, and evaluate individual services needed. The PA HMIS is also used to produce nonidentifying, aggregate reports that can be used to track program performance which is necessary to receive program funding from the federal government, identify unfilled service needs, and plan for new service provision.

This process is beneficial to improving your case management and received services, as well as assisting PA HMIS Participating Agencies to locate multiple housing or service options. Additionally, sharing information between PA HMIS Participating Agencies can reduce the number of times you are asked for repeated information. By consenting to share this information with participating agencies, you will allow PA HMIS to provide better coordination between PA HMIS Participating Agencies in an effort for you to obtain and maintain permanent housing.

Information collected in the PA HMIS database is protected in compliance with the standards set forth in the Health Insurance Portability and Accountability Act (HIPAA). Every person and agency that is authorized to read or enter information into the database has signed an agreement to maintain the security and confidentiality of your information. Any person or agency that is found to violate their agreement may have their access rights terminated and may be subject to further penalties including legal action.

I UNDERSTAND THAT:

- In an effort to end homelessness and to better serve me and/or my family, the PA HMIS Participating Agency identified at the bottom of this form will collect and may share my identifying information with other PA HMIS Participating Agencies via PA HMIS.
- The intention and purpose of collecting and sharing my information is to help PA HMIS Participating Agencies better understand and assist my/our needs, and to produce non-identifying, aggregate reports to the federal government that can be used to track the program performance of these agencies.
- The PA HMIS participating agencies have signed agreements and are bound to implement policies to maintain my information in a secure and confidential manner, as mandated by Federal and State laws.
- The release of my information does not guarantee that I will receive assistance. Alternatively, refusing to release my information will not affect my opportunity to receive assistance.
- This authorization will remain in effect for a period of up to 7 years or until I revoke it in writing. I may revoke authorization at any time by returning to any previously visited PA HMIS Participating Agency and signing a new consent form using the “I do not agree” option. If I revoke my authorization or this authorization expires, all information about me already in the database will remain to retain usage history; however, it will be inactive and not updated. I further understand that any revocation of this consent will not affect the waiver of confidentiality as to information already disclosed.

PA HMIS Collaborative Client Consent Release of Information via PA HMIS

- If I decline to release my information, it will be hidden from all other PA HMIS participating agencies, except in the case of a referral. If I need to be referred to another agency for services, my information will be forwarded to only that agency, regardless of my recorded data sharing preference.

Please choose an option:

- I **agree** to allow sharing of my information via the PA HMIS system with PA HMIS participating agencies.
- I **do not agree** to allow sharing of my information via the PA HMIS system with PA HMIS Participating Agencies. I understand that if I need to be referred to another agency, only the data necessary to complete the referral will be forwarded.

_____ Client Name <i>(Please print)</i>	_____ Client Signature	_____ Date
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_____ Guardian Name, if applicable <i>(Please print)</i>	_____ Guardian Signature, if applicable	_____ Date
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List Dependent(s) Name(s), if applicable

(Note: If dependents are not presenting for services at the same time as the guardian, or the guardian wishes to record different individual consent responses, use a separate consent form for each dependent.)

PA HMIS Participating Agency Name *(Please print)*

_____ Agency Personnel <i>(Please print)</i>	_____ Agency Personnel Signature	_____ Date
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APPENDIX G: LIST OF PROGRAMS TARGETING PEOPLE EXPERIENCING HOMELESSNESS

Coordination with Other Programs
Programs Targeted to People Experiencing Homelessness

Per 24 CFR Part 576.400(b):

(b)Coordination with other targeted homeless services. The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. These programs include:

- (1)** Shelter Plus Care Program ([24 CFR part 582](#)); (now part of CoC Program)
- (2)** Supportive Housing Program ([24 CFR part 583](#)); (now part of CoC Program)
- (3)** Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals ([24 CFR part 882](#));
- (4)** HUD - Veterans Affairs Supportive Housing (HUD-VASH) (division K, title II, Consolidated Appropriations Act, 2008, [Pub. L. 110-161](#) (2007), [73 FR 25026](#) (May 6, 2008));
- (5)** Education for Homeless Children and Youth Grants for State and Local Activities (title VII-B of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11431et seq.](#)));
- (6)** Grants for the Benefit of Homeless Individuals (section 506 of the Public Health Services Act ([42 U.S.C. 290aa-5](#)));
- (7)** Healthcare for the Homeless ([42 CFR part 51c](#));
- (8)** Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act ([42 U.S.C. 5701et seq.](#)));
- (9)** Projects for Assistance in Transition from Homelessness (PATH) (part C of title V of the Public Health Service Act ([42 U.S.C. 290cc-21et seq.](#)));
- (10)** Services in Supportive Housing Grants (section 520A of the Public Health Service Act);
- (11)** Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11331et seq.](#)));
- (12)** Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act ([42 U.S.C. 13975](#)));
- (13)** Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act ([38 U.S.C. 2021](#));
- (14)** Domiciliary Care for Homeless Veterans Program ([38 U.S.C. 2043](#));
- (15)** VA Homeless Providers Grant and Per Diem Program ([38 CFR part 61](#));
- (16)** Health Care for Homeless Veterans Program ([38 U.S.C. 2031](#));
- (17)** Homeless Veterans Dental Program ([38 U.S.C. 2062](#));

- (18) Supportive Services for Veteran Families Program ([38 CFR part 62](#)); and
- (19) Veteran Justice Outreach Initiative ([38 U.S.C. 2031](#)).

Per Western PA CoC (PA-601)

- (1) PA Homeless Assistance Program (HAP)
- (2) PA Housing Affordability Fund (PHARE) – for projects targeted to serve households at risk of homelessness or experiencing homelessness
- (3) Home4Good

Per 24 CFR Part 576.400(c):

(c) System and program coordination with mainstream resources. The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:

- (1) Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 ([42 U.S.C. 1437g](#)) ([24 CFR parts 905, 968, and 990](#));
- (2) Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 ([42 U.S.C. 1437f](#)) (respectively [24 CFR parts 982 and 983](#));
- (3) Supportive Housing for Persons with Disabilities (Section 811) ([24 CFR part 891](#));
- (4) HOME Investment Partnerships Program ([24 CFR part 92](#));
- (5) Temporary Assistance for Needy Families (TANF) ([45 CFR parts 260-265](#));
- (6) Health Center Program ([42 CFR part 51c](#));
- (7) State Children's Health Insurance Program ([42 CFR part 457](#));
- (8) Head Start (45 CFR chapter XIII, subchapter B);
- (9) Mental Health and Substance Abuse Block Grants ([45 CFR part 96](#)); and
- (10) Services funded under the Workforce Investment Act ([29 U.S.C. 2801 et seq.](#))



APPENDIX H: WESTERN PA CoC HOMELESSNESS PREVENTION SCREENING TOOLKIT

Homelessness Prevention (HP) Screening Toolkit (v.1 Sept. 2020)

Overview

The Department of Community and Economic Development requires all ESG grantees to establish eligibility and targeting strategies for screening applicant households for homelessness prevention assistance. This eligibility screening and targeting is documented using a standardized homelessness prevention (HP) screening form, which is based off of an approved eligibility criteria and targeting threshold score and has been used historically for SSVF HP programs with demonstrated success. The purpose of the screening tool is to target ESG-HP resources to those who are most at-risk of becoming homeless. Furthermore, the eligibility criteria and targeting threshold score serve as a tool for prioritizing households eligible for homelessness prevention services when capacity for providing such is limited and also supports grantees in determining the intensity of homelessness prevention services that an eligible household may receive.

This toolkit describes the process for a CoC-wide homelessness prevention targeting strategy and provides instructions on how to complete each form. The following materials are included in the Homelessness Prevention Screening Toolkit and will assist grantees in implementing an effective homelessness prevention component of the ESG Program:

Homelessness Prevention (HP) Screening Form

This form is required to be completed by ESG grantee staff when screening households for eligibility of homelessness prevention assistance. Once an eligibility determination is made, grantees must maintain the signed form within the applicant household's case file. The HP Screening Form consists of two stages that will guide grantees and household applicants through the process of determining program eligibility, imminent risk of literal homelessness, and the intensity of homelessness prevention service that may be provided to that eligible household. The form requires a high volume of information, most of which is provided during the initial discussions between applicant households and screening/intake coordinators. Please ensure that the staff person responsible for completing this form has a strong understanding of the approved eligibility criteria and targeting threshold score, as well as the purpose of each screening stage. Grantees have the option of using a form-fillable PDF document that, once completed, can be printed and stored in the client case file. Alternatively, grantees may print the form and manually complete each section.

Companion Guide to the ESG Homelessness Prevention Screening Form

There is also a companion guide to assist grantee staff in completing the screening form and for understanding the two stages of screening. The questions are intended to be a starting point for staff to guide an in-depth discussion with household applicants around program eligibility and targeting criteria. A critical component of eligibility for homelessness prevention services is whether an applicant household is at risk of literal homelessness, which the companion guide describes in detail.

Grantees may access this toolkit and the accompanying forms on the Western PA CoC website.

<https://pennsylvaniacoc.org/westerncoc/>

Homelessness Prevention (HP) Screening Form (v.1 Sept 2020)

COMPANION GUIDE

The ***Homelessness Prevention (HP) Screening Form*** is designed to help staff assess, document, and determine whether a household applying for homelessness prevention assistance:

- Meets the criteria for ESG Program eligibility
 - "At Risk of Homelessness" as defined at 24 CFR 576.2, or
 - "Homeless" as defined in paragraphs (2) or (4) of the definition at 24 CFR 576.2.

AND;

- Meets the established threshold targeting score (**15+**) that prioritizes those most at risk of becoming literally homeless, in the event there are not sufficient resources to assist all eligible households.

This companion guide describes the two stages of screening required for all persons applying for ESG homelessness prevention assistance. Grantees are required to implement the newest version of the ***Homelessness Prevention (HP) Screening Form*** (version 1) within their grant program, no later than October 1, 2020. The screening form must be completed by grantee staff for each applicant household, using information obtained from the head of household. Questions included on the form are intended to be a starting point for a discussion between program staff and the applicant household regarding program eligibility and targeting criteria for homelessness prevention assistance.

SCREENING FOR STAGE 1: ESG HOMELESSNESS PREVENTION ELIGIBILITY

To be eligible for ESG homelessness prevention assistance, a household must be screened for and meet each of the eligibility conditions described below.

Condition 1. Very Low-Income Status: Applicant household gross annual income must be less than 30% of area median income based on the income limits most recently published at:
<http://www.huduser.org/portal/datasets/il.html>.

Condition 2. At-Risk - Category 1c or Homeless - Category 2 or 4:

- "At Risk of Homelessness" as defined at 24 CFR 576.2, or
- "Homeless" as defined in paragraphs (2) or (4) of the definition at 24 CFR 576.2.

Determining Eligibility: It is recommended grantees utilize Appendix A to help further understand the eligibility requirements. ESG is not an eviction prevention program. It is intended to prevent households from losing all housing and ending up in emergency shelter or on the street. Some households who apply for ESG Homelessness Prevention assistance may be losing their housing, but they have another safe and appropriate housing option – including temporary options – where they can stay while they work to obtain their own housing. Or, an applicant may have another resource they can use to maintain current housing or obtain new housing. Such applicants would not be considered at imminent risk of literal homelessness.

Sections 3A through 3C of the screening form include questions to aid in determining whether a household meets the definition for At Risk - Category 1c or Homeless - Category 2 or 4 and is within the appropriate window of losing their housing, 21 and 14 days respectively, when applying for assistance and is, therefore, eligible for ESG homelessness prevention services. Staff should use these questions as a starting point and ask additional questions to better understand an applicant's current circumstances and options. ESG staff should seek to determine whether the household has safe, viable, immediate housing options and resources to keep them from becoming literally homeless.

- **3A: Housing Loss.** This section explores whether a household has a place to stay tonight and whether they must in fact leave their current housing arrangement. Staff should explore whether the household could avoid literal homelessness by negotiating directly with their landlord. Staff should also seek to determine if the household is in immediate need of assistance to ensure they have a safe and appropriate place to stay in the near term. **Note:** To the degree that ESG funds are being used to provide services to households fleeing domestic violence, RRH should only be used if that household is also currently meeting the category 1 definition of literal homelessness, while all others should be served through Prevention, if otherwise eligible. For a household fleeing domestic violence to receive ESG rapid rehousing assistance, the household must meet the eligibility criteria under the rapid rehousing component. Under the ESG Interim Rule, rapid rehousing assistance may only be provided to "program participants who meet the criteria under paragraph (1) of the 'homeless' definition in §576.2 or who meet the criteria under paragraph (4) of the 'homeless' definition AND live in an emergency shelter or other place described in paragraph (1) of the 'homeless' definition." (24 CFR § 576.104). An individual or family that qualifies as homeless under Category 4 but does not live in an emergency shelter or other place described in paragraph (1) of the 'homeless' definition would not be eligible for ESG rapid rehousing assistance but may be eligible for ESG homelessness prevention assistance. Additionally, if the household meets the criteria under either Category 2 or 3 of the homeless definition or the criteria under the at-risk definition, the household may be eligible for Homelessness Prevention assistance.
- **3B: Other Housing Options & Resources.** This section explores whether the household has other friends, family or close support networks that could assist them in avoiding literal homelessness. ESG staff should engage in a conversation with the household regarding potential support and use this information to determine whether the household has other housing options and resources available to them. Staff should be particularly mindful of any inappropriate, unsafe, or otherwise unhealthy relationships the household is reluctant or refuses to pursue and not assume such options are viable to prevent the household's homelessness.
- **3C: Financial Resources.** This section explores whether the household has financial resources to pay for their immediate housing costs. This may include their own resources, community resources, or financial assistance they are eligible for and is available in time to prevent literal homelessness. This section should still be discussed for planning purposes even if the primary reason for the household losing their current housing is not related to financial need.

Understanding Stage 1 ESG HP Eligibility Disposition:

Households who do not meet Stage 1 eligibility requirements should be identified as **"NOT ELIGIBLE"** on the form and offered information and referral, including a "warm hand off" referral, to other assistance as needed and desired. The household should also be recorded under the "screened but not enrolled" applicants that grantees track outside of the HMIS reporting requirements for ESG households.

A household that meets all of the ESG eligibility conditions listed in Stage 1 should be identified as **"ELIGIBLE"** on the form and qualifies for, at a minimum, ESG "Light Touch" homelessness prevention services, which are interventions other than temporary financial assistance. These households should next be screened for Stage 2 Targeting.

STAGE 2: TARGETING

All applicants who meet Stage 1 eligibility must then be screened using the targeting conditions and threshold point system described in Stage 2. Points have been assigned to factors based on research and practical experience. Stage 2 screening provides grantees with a standardized tool for determining how to prioritize eligible households for ESG Homelessness Prevention assistance based on: 1) urgency of the applicant's current housing situation, and; 2) other barriers and vulnerabilities that may impact their ability to quickly secure housing and resolve literal homelessness independently, if they are not assisted and become literally homeless. Stage 2 screening is critical when an ESG Program does not have sufficient resources or capacity to provide homelessness prevention services to every household that meets Stage 1 eligibility and could become literally homeless. The targeting threshold score for ESG HP is 15+.

Understanding Stage 2 Targeting Disposition:

Households that meet Stage 1 eligibility and score at or above the approved threshold score should be identified as **"Meets Targeting Threshold"** in Stage 2. Households that have met both Stage 1 and Stage 2 requirements may receive the full range of ESG homelessness prevention services, including any temporary financial assistance (TFA). These households should be enrolled in the ESG program and tracked within HMIS. It is important to note that HUD expects grantees to use a progressive approach to the delivery of services. This means that even if a household passes both the Stage 1 eligibility and Stage 2 targeting requirements of a given ESG program, this does not necessarily mean that TFA should automatically be offered. Grantees should aim to provide the least intensive and costly intervention possible and only use more intensive services or the provision of TFA when absolutely necessary to prevent a household from becoming literally homeless.

Households who meet Stage 1 eligibility requirements but do not score at or above the established targeting threshold score should be identified as **"Does Not Meet Targeting Threshold"** in Stage 2. These households may receive only "Light Touch" ESG services (i.e. 30 days case management), which do not include TFA. These households should be enrolled in the ESG program and tracked within HMIS.

CERTIFYING THE ESG HP SCREENING

Information recorded in the screening form must be supported by additional documentation (e.g., proof of income). Forms must be signed and dated by the head of household, by the authorized ESG staff person completing the form, and by an ESG program supervisor. The completed form and additional documentation must be kept in the program participant's case file. The form is available in a PDF fillable document, which may be completed electronically, printed, and maintained within the program participant's case file. However, the form may also be printed and completed manually by the ESG program staff.

Homelessness Prevention (HP) Screening Form (v.1 Sept 2020)

SCREENING DATE (e.g., 10/01/2015)

		/			/				
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APPLICANT HEAD OF HOUSEHOLD

First Name

Last Name

--	--

OTHER HOUSEHOLD MEMBERS (attach an additional page as needed)

STAGE 1: ELIGIBILITY FOR ESG HP

Eligibility Condition 1. Very Low-Income Status

<i>Household size (all adults/children):</i>	
<i>Total Annual Gross Income from All Sources:</i>	\$
<i>30% (ESG) or 50%(ESG-CV) of Area Median Income for Household:</i>	\$

ESG STAFF DISPOSITION:

Is gross annual household income less than 30% or 50% Area Median Income for household size (grantee may use 30% for both ESG and ESG-CV)? YES NO

IF "NO", STOP: APPLICANT NOT CURRENTLY ELIGIBLE.

Documentation obtained? YES NO

Eligibility Condition 2. At Risk - Category 1c or Homeless - Category 2 or 4

3A: Housing Loss Assessment

Next, we need to know some details about your current housing situation so we can understand how best to assist you.

Can you tell me about the place you stayed last night? Is this the primary place you stay or is there somewhere else you normally stay? If there's somewhere else you normally stay, can you tell me about that place?

Identify the primary place where applicant is staying (check only one):

- Hotel or motel paid for without emergency shelter voucher
- Staying or living in a family member's room, apartment or house
- Staying or living in a friend's room, apartment or house
- Rental by client, no ongoing housing subsidy
- Rental by client, with HUD VASH subsidy
- Rental by client, with other ongoing housing subsidy
- Permanent housing for formerly homeless persons (e.g., CoC Program funded unit)
- Owned by client, no ongoing housing subsidy
- Owned by client, with ongoing housing subsidy
- Hospital or other residential non-psychiatric medical facility*
- Long-term care facility or nursing home*
- Jail or prison*
- Residential project or halfway house with no homeless criteria*
- Psychiatric hospital or other psychiatric facility*
- Substance abuse treatment facility or detox center*
- Other (describe): _____

*If staying in institution, determine if stay there is 90 days or less and if previously stayed in emergency shelter, Safe Haven, or on the street. Such individuals are considered literally homeless and should instead be screened for ESG RRH assistance.

[Staff Note: Applicants staying in emergency shelter, including hotel/motel paid for with emergency shelter voucher, a Safe Haven, transitional housing, or in a place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside) are considered literally homeless and should be screened/referred for ESG RRH assistance.

Do you have to leave this place (or the place you normally stay)?

YES

NO

N/A

[Staff Note: Briefly describe reasons why applicant has to leave current place they are staying and obtain copy of any written documentation.]

If yes, what's causing you to have to leave? How long can you continue to stay there?

Identify why the applicant must leave the primary place they are staying (check only one):

- Court-ordered eviction notice to vacate rental unit
- Formal written notice from landlord to vacate rental unit (e.g., 30 day Notice to Quit)
- Written or verbal notice from family, friend or host to leave doubled-up housing
- Exiting an institution or system of care (e.g., hospital, jail, treatment facility, etc.)
- Insufficient resources to continue to pay for hotel or motel
- Other (describe): _____

[Staff Note: Applicants who have only received a verbal notice from landlord and applicants who are only behind on utilities and have not received a formal written eviction notice are not eligible for ESG HP assistance.]

By what date must the applicant leave the primary place they are staying: ____/____/____

[Staff Note: Must be within 21 days (At Risk definition) or 14 days (Homeless definition) to be eligible for ESG HP assistance.]

Have you tried asking for an extension on your rent payment or otherwise negotiating a way to stay in your current housing? YES NO N/A

If yes, what was the result of the conversation? If no, is this an option for you?

May I contact your current [landlord, host family/friend, other] to see if we can negotiate a solution so you can continue to stay there OR stay there while you find another place to live? YES NO N/A

ESG STAFF DISPOSITION:

Does the applicant meet the "At Risk of Homelessness" as defined at 24 CFR 576.2, or, "Homeless" as defined in paragraphs (2) or (4) of the definition at 24 CFR 576.2? YES NO

IF "NO", STOP: APPLICANT NOT CURRENTLY ELIGIBLE.

Documentation obtained? YES NO

3B: Other Housing Options & Resources

We would like to know if you have any other safe and appropriate place to stay – either permanently OR while you look for other housing. We would also like to know if you have family, friends or others you know that may be able to help you financially.

[Staff Note: Discuss and record below a summary related to each of the following potential housing options and sources of assistance: 1) family members or relatives; 2) close or trusted friends; and 3) faith-based group or network applicant associates with. Where appropriate, ask if a potential housing option can be contacted by you to help secure housing. Attach additional notes as necessary.]

Do you have a safe, appropriate place where you could live if you lose your current home? Let's talk about different types of options and whether any of these might be available to you as a safe, appropriate place to live, either permanently or while you seek other housing on your own. Let's start with family members and relatives...

If you're unsure if relatives, friends or others could help OR if there are any people or groups you have NOT contacted for help but you think might be willing to assist you...

Would you be willing to contact them OR may I contact them to find out if they can provide you with a place to stay, financial help, or other assistance to keep you from becoming homeless? This might include family, trusted friends or other groups (faith-based, social, etc.) that might be able to help.

YES NO NOT SURE

If YES, who should be contacted?

Name	Relationship to you	Phone number or email

ESG STAFF DISPOSITION: Briefly summarize efforts and discussion related to other possible housing options and resources and whether applicant lacks other safe/appropriate housing options (either permanent or one they can access while seeking other housing) and resources sufficient to avoid literal homelessness.

Does applicant have other safe/appropriate housing options and/or resources sufficient to avoid literal homelessness? YES NO

IF "YES", STOP: APPLICANT NOT CURRENTLY ELIGIBLE.

3C: Financial Resources

We would like to find out if you have any funds or if there is other assistance immediately available to you and that you could access to help you keep your current housing or immediately find other housing.

Approximately how much money would you need to pay immediately in order to keep your housing OR obtain other housing?

\$ _____

Do you have any funds or other assistance immediately available to you and that you could access to help you keep your current housing or immediately find other housing?

Approximately how much money do you currently have available in savings, assets or other accounts?

\$ _____

Do you have enough money to pay for your current housing costs, including any rent or utility arrears?

YES NO NOT SURE

Are there other community resources you've applied for, such as other eviction prevention programs, emergency financial assistance programs, utility assistance programs, or other local emergency assistance programs?

YES NO NOT SURE

If you have no other financial resources and are unsure if there are other community resources that could help, we may be able to refer you to other resources that would be more appropriate than ESG.

Can we help provide information about other resources? YES NO

If YES, identify each resource:

Resource	Potential Assistance Available	Disposition (e.g., information & referral provided; contacted and not available; etc.)

ESG STAFF DISPOSITION: Briefly summarize efforts and discussion related to financial resources and whether other (non-ESG) financial resources are available to avoid literal homelessness. If they will lose housing *regardless* of their own financial resources or other financial assistance, explain.

Does applicant have enough financial resources to avoid literal homelessness?

YES NO N/A (Housing loss occurring regardless of financial resources)

IF "YES", STOP: APPLICANT NOT CURRENTLY ELIGIBLE.

Stage 1: Eligibility Disposition

ELIGIBLE: Meets all eligibility requirements above

YES, CONTINUE TO STAGE 2

NOT ELIGIBLE: Does not meet one or more eligibility requirements

NO, STOP (reference HP Screening Form Instructions for next steps)

HOMELESS PREVENTION TARGETING MATRIX

TARGETING CRITERIA <small>Use the following criteria to identify if the eligible applicant household is also a priority for ESG homelessness prevention assistance. Check each condition that is true for the applicant.</small>	Check if Applicable	Point Value	TOTAL POINTS
URGENCY OF HOUSING SITUATION (May indicate more urgent need for homelessness prevention assistance)			
Referred by Coordinated Entry or a homeless assistance provider to prevent the household from entering an emergency shelter or transitional housing or from staying in a place not meant for human habitation.	<input type="checkbox"/>	5	
Current housing loss expected within... (select only one)	<input type="checkbox"/>		
0-6 days	<input type="checkbox"/>	5	
7-13 days	<input type="checkbox"/>	4	
14-21 days	<input type="checkbox"/>	3	
POTENTIAL BARRIERS AND VULNERABILITIES (May impact ability to quickly secure housing and resolve literal homelessness independently <u>if</u> household is not assisted and becomes literally homeless)			
<u>Current</u> household income is \$0 (i.e., not employed, not receiving cash benefits, no other current income)	<input type="checkbox"/>	5	
<u>Annual</u> Household Gross Income Amount (select only one)	<input type="checkbox"/>		
0-14% of Area Median Income (AMI) for household size	<input type="checkbox"/>	4	
15-30% of AMI for household size	<input type="checkbox"/>	3	
Sudden and significant decrease in cash income (employment and/or cash benefits) AND/OR unavoidable increase in non-discretionary expenses (e.g., rent or medical expenses) in the past 6 months	<input type="checkbox"/>	3	
Major change in household composition (e.g., death of family member, separation/divorce from adult partner, birth of new child) in the past 12 months	<input type="checkbox"/>	3	
Rental evictions within the past 7 years (select only one) <small>[Staff Note: Only include formal eviction actions (i.e., Notice to Quit) taken by a landlord due to lease non-compliance and that ultimately resulted in loss of rental housing.]</small>	<input type="checkbox"/>		
4 or more prior rental evictions	<input type="checkbox"/>	5	
2-3 prior rental evictions	<input type="checkbox"/>	4	
1 prior rental eviction	<input type="checkbox"/>	3	
Currently at risk of losing a tenant-based housing subsidy or housing in a subsidized building or unit	<input type="checkbox"/>	3	

History of Literal Homelessness (street/shelter/transitional housing) (select only one)			
4 or more times or total of at least 12 months in past three years	<input type="checkbox"/>	5	
2-3 times in past three years	<input type="checkbox"/>	4	
1 time in past three years	<input type="checkbox"/>	3	
Head of household with disabling condition (physical health, mental health, substance use) that directly affects ability to secure/maintain housing	<input type="checkbox"/>	3	
Criminal record for arson, drug dealing or manufacture, or felony offense against persons or property	<input type="checkbox"/>	4	
Registered sex offender	<input type="checkbox"/>	5	
At least one dependent child under age 6	<input type="checkbox"/>	3	
Single parent with minor child(ren)	<input type="checkbox"/>	3	
Household size of 5 or more requiring at least 3 bedrooms (due to age/gender mix)	<input type="checkbox"/>	3	
POLICY PRIORITIES			
Any Veteran in household <i>*Note: Please refer eligible veterans to SSVF first</i>	<input type="checkbox"/>	3	
Need to leave your home due to someone making you feel unsafe and/or current housing needs due to safety concerns	<input type="checkbox"/>	3	
Youth head of household (Age 24 or under head of household)		3	
TOTAL POINTS			

Targeting Disposition	
Meets Targeting Threshold Targeting Threshold Score ≥ 15	Does Not Meet Targeting Threshold Targeting Threshold Score < 15
Assistance Recommendations 15-25 Points: Short-term Assistance 26+ Points: Medium Term Assistance	Provide case management, referrals for other assistance, etc. Reevaluate household eligibility if there is a significant change.

Applicant Certification

By signing below I certify that the information provided above is correct, so far as I know and understand, and that I do not have other housing options or sufficient resources or support networks (e.g., family, friends, faith-based or other social networks) immediately available to prevent my household from becoming literally homeless.

HoH Name: _____

HoH Signature: _____

Date: _____

Staff Certification

By signing below I certify that I have worked with the household to identify housing resources and solutions and believe, based on the information presented, that the household is eligible for ESG services and will become literally homeless unless ESG assistance is provided. Further, I certify that all supporting documentation required for ESG enrollment has been obtained and verified and is contained in the participant's case file.

ESG Staff Name: _____

ESG Staff Signature: _____

Date: _____

Supervisor Approval

ESG Staff Signature: _____

Date: _____

APPENDIX A

COVID-19

Homeless System Response: ESG Homelessness Prevention Eligibility During Eviction Moratoria

This document reviews the eligibility criteria for COVID-19 Emergency Solutions Grants Program (ESG-CV) Homelessness Prevention (HP) assistance provided to households facing an eviction action.

When a leaseholder faces eviction initiated by a property owner or landlord, that household may qualify for HP assistance under either:

- Category 1, Risk Factor (c) of the definition of "At Risk of Homelessness" (At Risk—Category 1c); or
- Category 2 of the definition of "Homelessness" (Homeless—Category 2).

The Coronavirus Aid, Relief, and Economic Security (CARES) Act moratorium on evictions and other eviction moratoria implemented by states impact a household's ability to qualify for HP assistance under these criteria. In addition to explaining the differences between the documentation requirements for At Risk—Category 1c versus Homeless—Category 2, this document identifies how the Federal CARES Act Eviction Moratorium and other state eviction moratoria affect a household's ability to qualify for ESG HP assistance based on a landlord-initiated eviction action.

IMPORTANT NOTE

There are other situations, beyond those involving a landlord-initiated eviction action, when a household may qualify for HP assistance under At Risk—Category 1c or Homeless—Category 2.

For example: an individual who is not on the lease is being forced to move out of a unit by the leaseholder within a 14-day or 21-day time period. That individual could qualify for HP assistance despite an eviction moratorium being in effect.

Here are additional resources that explain other ways that households may qualify for ESG HP eligibility on the HUD Exchange:

- [Criteria for Definition of At Risk of Homelessness](#)
- [At Risk Status and Income: Recordkeeping Requirements Webinar for ESG Grantees](#)
- [Homeless Status: Recordkeeping Requirements Webinar](#)
- [Determining Homeless and At-Risk Status, Income and Disability Webinar](#)
- [Understanding Program Participant Eligibility for ESG Rapid Re-Housing and Homelessness Prevention Components](#)

Summary of ESG Homelessness Prevention (HP) Eligibility Criteria

There are many situations when a household may qualify for ESG HP assistance that are not impacted by an eviction moratorium. This section summarizes all ESG HP eligibility criteria. Both initial and continuing eligibility for ESG HP assistance are based on 1) Housing status; 2) Household income; and 3) Need for assistance.

Housing Status:

To be eligible for Homelessness Prevention assistance, an individual or family must be either:

- "At Risk of Homelessness" as defined at 24 CFR 576.2, or
- "Homeless" as defined in paragraphs (2), (3), or (4) of the definition at 24 CFR 576.2.

Household Income:

- Normally, under the ESG program, individuals and families must have an annual household income below 30 percent of the average median family income (AMI) for the area, as calculated by HUD (see "Income Limits Data"). However, under ESG-CV, individuals and families may have an income up to 50 percent AMI for the area.
- To determine the annual income of an individual or family, the recipient or subrecipient must use the standard for calculating annual income under 24 CFR 5.609.

Need for Assistance:

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant:

- Regain stability in their current permanent housing; or
- Move into other permanent housing and achieve stability in that housing.

The sections below provide more detail about eligibility criteria under the definitions of "Homeless" and "At Risk of Homelessness."

"HOMELESS" DEFINITION

An individual or family is eligible if the household:

HAS AN INCOME NO GREATER THAN 30% AMI (annual ESG) or 50% AMI (ESG-CV)

For more information on the income limits in your community, please see: https://www.huduser.gov/portal/datasets/il/il2020/select_Geography.odn

AND

MEETS ANY ONE OF THE FOLLOWING CATEGORIES OF THE "HOMELESS" DEFINITION

CATEGORY 2	CATEGORY 3	CATEGORY 4
<p>The household will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; and • No subsequent residence has been identified; and • The individual or family lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing. 	<p>The household consists of unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify under this definition, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under other Federal definitions¹; and • Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; and • Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and • Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or child abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment. 	<p>The individual or family member is:</p> <ul style="list-style-type: none"> • Fleeting or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; and • Has no other residence; and • Lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing.

¹ Other Federal definitions of "homeless" referenced above for Homeless-Category 3 are: Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a); Section 637 of the Head Start Act (42 U.S.C. 9832); Section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2); Section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)); Section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012); Section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)); or Section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a).

Category 2 of the “Homeless” definition encompasses households that are at imminent risk of homelessness. In addition to situations where a household could lose its residence due to a landlord-initiated eviction action, individuals and families not on a lease could also meet Category 2 of the “Homeless” definition when asked to leave a residence with no other place to go or resources or support networks available to obtain other permanent housing.

Category 3 of the “Homeless” definition applies to unaccompanied youth under 25 or families with children and youth who do not otherwise meet HUD’s definition of “homeless” but who meet the “homeless” definition under one of the federal statutes identified above. Additionally, the household must have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the last 60 days. They must also have moved two or more times during the last 60 days and can be expected to continue in such status for an extended period of time because of a chronic disability, chronic physical or mental health condition, substance use, history of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment.

Category 4 of the “Homeless” definition applies to individuals or families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, who have no other place to go or resources or support networks available to obtain other permanent housing.

“AT RISK OF HOMELESSNESS” DEFINITION

An individual or family is eligible if the household:

HAS AN INCOME NO GREATER THAN 30% AMI (annual ESG) or 50% AMI (ESG-CV)

For more information on the income limits in your community, please see:
https://www.huduser.gov/portal/datasets/il/il2020/select_Geography.odn

AND

LACKS SUFFICIENT RESOURCES OR SUPPORT NETWORKS

The household does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “Homeless” definition.

AND

MEETS ANY ONE OF THE FOLLOWING RISK FACTORS

The household:

- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance;
- Is living in the home of another because of economic hardship;
- Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- Lives in a hotel or motel and the cost is not paid for by charitable organizations or by federal, state or local government programs for low-income individuals;
- Lives in an SRO or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than one-and-a-half persons per room;
- Is exiting a publicly funded institution or system of care; or
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan.

An individual or family is eligible to receive ESG HP assistance if the household meets all three of the elements above. In addition to meeting the income requirements and not having the resources and support networks needed to prevent them from moving to an emergency shelter or place that is not designed for or ordinarily used as a regular sleeping accommodation for human beings (e.g., cars, parks, abandoned buildings, bus or train stations, airports, or camping grounds), the household must meet **one** of the “At Risk” conditions listed above, which include situations such as: frequent moves, living in the home of another due to economic hardship, living in overcrowded situations, and exiting a publicly funded institution.

The next section will take a closer look at the “At Risk” condition involving a household that has been notified that their right to occupy their current housing or living situation will be terminated with 21 days. While the scope of this document focuses on households on a legally binding lease that have received notice from a landlord that their tenancy rights are being terminated, this “At Risk” condition can also be met by a household not on a legally binding lease that has been notified they will have to leave their current living situation within 21 days.

Taking a Closer Look: At Risk—Category 1c and Homeless—Category 2

At Risk—Category 1c (when a household has a legally binding lease)

In this situation, a household’s right to occupy housing will be terminated within 21 days, although the household will not necessarily be required to physically vacate the unit within 21 days. To qualify under At Risk—Category 1c, the household must also meet the income requirements and lack the resources and support networks needed to prevent them from becoming literally homeless as outlined below:

Eligibility Criteria	Documentation Requirements
<p>Household income no greater than:</p> <ul style="list-style-type: none"> • 50% AMI (ESG-CV) • 30% AMI (ESG) 	<p>Access the Income Limit data for your community at:</p> <ul style="list-style-type: none"> • HUD’s FY 2020 Income Limits Documentation System; or • HUD’s Income Calculator <p><u>Do not</u> include stimulus assistance or Federal Pandemic Unemployment Compensation Program payments in income calculations. See FAQs for Public Housing Agencies (OC6 and OC7).</p>
<p>Household lacks sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or place not designated or ordinarily used as a regular sleeping accommodation for human beings (e.g., cars, abandoned buildings, train stations, etc.).</p>	<ul style="list-style-type: none"> • Self-certification that: <ul style="list-style-type: none"> ○ The program participant has insufficient financial resources and support networks immediately available to attain housing stability; and ○ The program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of “At Risk of Homelessness” in 24 CFR 576.2. • The most reliable evidence available to show that the program participant does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or place not designated or ordinarily used as a regular sleeping accommodation for human beings.
<p>Household has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance.</p>	<p>See below for information about documenting Risk Factor (c) of At Risk—Category 1c when a household has a legally binding lease.</p>

Documenting Risk Factor (c) of the “At Risk of Homelessness” Definition When the Household Has a Legally Binding Lease

To substantiate that the household has been notified that their right to occupy their current housing will be terminated within 21 days, the documentation should include written notification from the landlord, property owner, or other entity with the authority to terminate tenancy that their rights as a tenant will terminate within 21 days. Documentation does not need to be the equivalent of a court-ordered eviction action. If the landlord notification provides a way for the tenant to remedy the situation and avoid eviction (e.g., paying the overdue rent balance), documentation must also substantiate that the applicant cannot meet the terms of avoiding eviction. Where source documents and third-party verification are unobtainable, a written statement by intake

staff describing the efforts taken to obtain the required evidence would be considered acceptable evidence. Intake worker notes should demonstrate that they have exercised due diligence in attempting to obtain a higher level of documentation.

Homeless—Category 2 (when a household has a legally binding lease)

In this situation, the household must physically vacate the unit within 14 days as a result of a court-ordered eviction, Notice to Quit, Notice to Terminate under state law, or another notice equivalent to an eviction action under applicable state law. In order to qualify for Homeless—Category 2, the household cannot have a subsequent residence identified, must lack the resources or support networks needed to obtain other permanent housing, and must also meet the income requirements as outlined below:

Eligibility Criteria	Documentation Requirements
Household income no greater than: <ul style="list-style-type: none"> • 50% AMI (ESG-CV) • 30% AMI (ESG) 	Access the Income Limit data for your community at: <ul style="list-style-type: none"> • HUD’s FY 2020 Income Limits Documentation System; or • HUD’s Income Calculator* Do not include stimulus assistance or Federal Pandemic Unemployment Compensation Program payments in income calculations. See FAQs for Public Housing Agencies (OC6 and OC7).
Household lacks the resources or support networks needed to obtain other permanent housing.	Document with a self-certification or other written documentation that the household lacks the resources and support networks needed to obtain other permanent housing.
No subsequent residence has been identified.	Document with a self-certification that no subsequent residence has been identified.
<u>Residence will be lost</u> within 14 days of the date of application for homeless assistance.	See below for information about documenting Criterion (i) of Homeless—Category 2 when a household has a legally binding lease.

*HUD’s Income Calculator has been updated to include 50% AMI data as of July 1, 2020.

Documenting Criterion (i) of Homeless—Category 2 When the Household Has a Legally Binding Lease

To substantiate that the household’s unit will be lost within 14 days, the documentation must include one of the following:

- A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; **or**
- Notice equivalent to an eviction action under applicable state law; **or**
- Notice to Quit; **or**
- Notice to Terminate under state law.

A Notice to Quit or a Notice to Terminate issued under state law does not need to be equivalent to a court-ordered eviction action. However, if there is no reasonable expectation that a household will lose their residence within 14 days as a result of the issuance of a Notice to Quit, Notice to Terminate, or demand notice, then the criteria of Category 2 are not met. Where source documents and third-party verification are unobtainable, a written statement by intake staff describing the efforts taken to obtain the required evidence would be considered

acceptable evidence. Intake worker notes should demonstrate that they have exercised due diligence in attempting to obtain a higher level of documentation.

Impact of Eviction Moratoria

CARES Act Eviction Moratorium

The CARES Act Eviction Moratorium protects most people whose housing is paid for through the ESG and Continuum of Care (CoC) Program. Section 4024(b) prohibits recipients and landlords receiving ESG and CoC Program funding from evicting people for nonpayment of rent during the 120-day period from the enactment of the CARES Act.

Accordingly, landlords of covered dwellings are prohibited from each of the following:

1. Filing new eviction actions between March 27, 2020 and July 24, 2020 for nonpayment of rent or nonpayment of other charges or fees;
2. Requiring a tenant to vacate the dwelling between March 27, 2020 and July 24, 2020 for nonpayment of rent or nonpayment of other charges or fees;
3. Charging fees, penalties, or other charges (including assessing or allowing charges to accrue) between March 27, 2020 and July 24, 2020 based on the tenant's nonpayment of rent; and
4. Issuing a notice to vacate for nonpayment of rent or other charges that provides less than 30 days' advance notice to the tenant or is received by the tenant between March 27, 2020 and July 24, 2020.

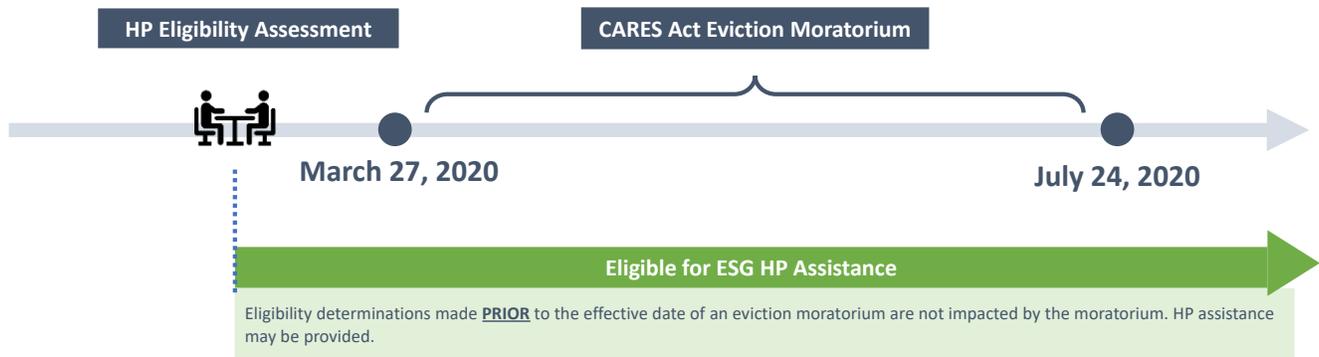
The moratorium does not waive the requirement for tenants to pay their rent. HUD strongly encourages recipients to work with those they serve to avoid evictions for rent owed after the moratorium ends. The Eviction Moratorium found in Section 4024(b) of the CARES Act only applies with respect to nonpayment of rent or nonpayment of other charges. The moratorium does not prevent lessors from filing for evictions for other violations of the lease or occupancy agreement or for nonpayment of rent prior to March 27, 2020. Therefore, recipients and landlords may still undertake an eviction action against a tenant based on the terms of the leases, as long as the eviction is unrelated to nonpayment of rent. However, please be sure to review the requirements related to termination of assistance in [24 CFR 578.91](#) of the CoC Program regulations and [24 CFR 576.402](#) of the ESG Program regulations. All recipients of CoC and ESG Program funding should do all they can to keep the people they serve from being evicted.

ESG or CoC Program participants who receive an eviction notice for nonpayment of rent should reach out to their case manager as soon as possible. The recipient or program participant can inform the landlord that the eviction is against the law if it applies to nonpayment of rent between March 27, 2020 and July 24, 2020 and that no fees and penalties related to nonpayment of rent can be charged. If a landlord proceeds with an eviction in violation of the eviction moratorium, the household would qualify for ESG HP assistance. In such situations, providers are encouraged to pursue other options first, such as explaining the terms of the applicable eviction moratorium to the landlord, enlisting legal services, and contacting the local HUD Field Office prior to providing financial assistance or rental assistance. For more information on how the Eviction Moratorium impacts the ESG and CoC Programs, please review the following HUD guidance: [How Does the Federal CARES Act Eviction Moratorium Impact the ESG and CoC Programs?](#)

Other State or Local Eviction Moratoria

Consult with state and local officials as to whether they have enacted a moratorium on evictions during the emergency. Be sure to identify the time period when the moratorium is in effect and be aware of any upcoming extensions. Also be aware of the applicability of the moratorium; for example, identify whether the moratorium applies only for nonpayment of rent or for other lease violations as well. Just as with the CARES Act Eviction Moratorium, state eviction moratoria also impact eligibility for ESG HP.

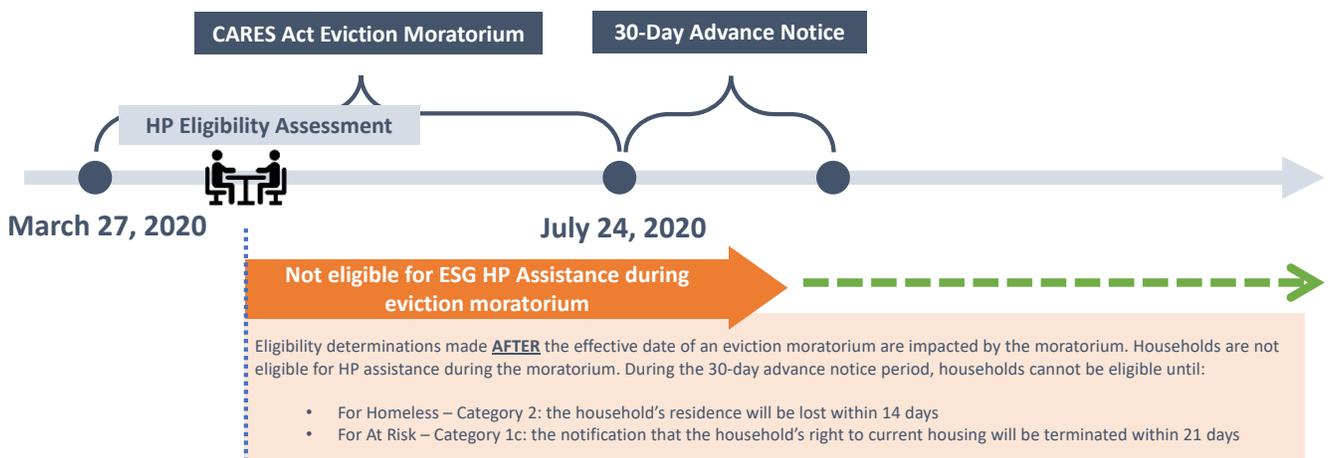
Impact of CARES Act Eviction Moratorium on HP Eligibility – Scenario 1



ESG HP Eligibility Determination Completed PRIOR to an Eviction Moratorium Taking Effect

Eligibility for ESG HP assistance depends on whether a household's intake and evaluation process occurred before or after a federal or state eviction moratorium took effect and whether the terms of the moratorium are applicable to the program participant's situation. If a household was determined to be eligible for ESG HP assistance before the moratorium took effect, the moratorium would not affect the household's eligibility determination. However, HUD encourages recipients/subrecipients to assess each program participant and assign an appropriate level of service intervention. In determining what additional supports to provide, the intake worker should consider all resources and support networks available to the household. Based on this assessment, the intake worker may determine that the household does not need rental assistance until the moratorium on eviction ends and then, at that point, the intake staff may re-evaluate the household's needs to take into account any recent changes to the household's circumstances prior to providing assistance.

Impact of CARES Act Eviction Moratorium on HP Eligibility – Scenario 2



ESG HP Eligibility Determination Completed AFTER an Eviction Moratorium Taking Effect

If the federal or state eviction moratorium is applicable to the program participant's situation (e.g., nonpayment of rent) and took effect prior to a determination of eligibility for ESG HP assistance, then the moratorium must be considered in the evaluation. This means that the household would not meet the eligibility requirements of ESG HP assistance until either: a) 21 days prior to the termination of a tenant's right to occupy the unit; or b) 14 days before a court-ordered eviction notice takes effect. Additionally, consider the moratorium as an eviction prevention support when determining a participant's resources and support networks available to retain housing.

Case managers need to use their judgment and consider changing circumstances such as a moratorium extension. Under all circumstances, a case manager should work with the household on their plan to retain permanent housing after the ESG assistance ends and to connect them to mainstream and other resources.

In cases where a household is ineligible for ESG HP assistance during an eviction moratorium, there are steps that providers may take to assist an individual or family to regain housing stability:

- Use problem-solving techniques.
- Identify other funding that can provide assistance. Review [Five Things to Consider When Investing ESG in Homelessness Prevention](#) for tips to help communities develop and implement a prevention strategy that effectively and efficiently uses resources for prevention.
- Start collecting documentation to prepare for the end of the moratorium in case the household later becomes eligible, and continue to problem solve.

Other Considerations: Prioritization & Written Standards

Prioritization

HUD strongly encourages each jurisdiction to focus as much of its ESG HP funding as possible on prioritizing those with the greatest need of assistance, which could mean targeting HP assistance on those households that are more likely to be evicted without ESG assistance.

Written Standards

In addition to complying with ESG Program regulations, ESG HP providers must also comply with their recipient's written standards. The ESG written standards include policies and procedures for determining and prioritizing which eligible families and individuals will receive HP assistance. The recipient may choose to modify HP prioritization to better target those in need of the most assistance due to the COVID-19 pandemic.



APPENDIX I: CoC FAIR AND EQUAL ACCESS POLICY

WESTERN PA CONTINUUM OF CARE (PA -601)
Fair and Equal Access Policy

Policy

The Pennsylvania Western Region Continuum of Care will ensure fair and equal access to the Coordinated Entry system programs and services for all consumers regardless of actual or perceived race, color, religion, national origin, age, gender identity, pregnancy, citizenship, familial status, household composition, disability, Veteran status, sexual orientation, or domestic violence status.

To ensure fair access by individuals with disabilities, physical and communication accessibility barriers must be addressed by appropriate accommodation within each Coordinated Entry System.

All authorized user agencies who enter into an MOU for Coordinated Entry and agree to take full responsibility for complying with Fair Housing and all other funding and program requirements. If an individual's self-identified gender or household composition creates challenging dynamics among residents within a facility, the host program is required to make every effort to accommodate the individual or assist in locating alternative accommodation that is appropriate and responsive to the individual's needs.



APPENDIX J: CoC DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND STALKING MANAGEMENT POLICY

WESTERN PA CONTINUUM OF CARE (PA -601)
Domestic Violence, Dating Violence, Sexual Assault & Stalking Management Policy

HUD Coordinated Entry Notice: Section 11.B.10

Policy

The Western CoC Board of Directors are aware and understand the need for protection policies to address the safety planning needs of all individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, human trafficking or stalking that meet both the requirements of HUD and the laws of the Commonwealth of Pennsylvania. It is the intention of this Western CoC to ensure that the Coordinated Entry System has built into is core the safety factor as a major part of all parts and parcels of the Coordinated Entry System. Therefore the Coordinated Entry System shall meet the following:

- All persons who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, human trafficking or stalking shall expect and receive safe, confidential access to the Coordinated Entry Process including immediate access to the emergency services necessary for their safety including, but not limited to, the domestic violence hotlines, shelter, safety planning and housing when possible.
- These persons shall remain anonymous within the PAHMIS/Client Track assessment tool and during the initial assessment processes.
- Safety and Confidentiality Training shall be provided at least annually to both DVACs and GACs to ensure that safety is in the forefront during assessment and housing determination periods.
- Well documented and laid out consent forms will be required for each phase of the assessment process.