

# **POLK COUNTY CONTINUUM OF CARE**

## **Standards for Providing Assistance in Continuum of Care and Emergency Solutions Grant Programs**

**DISCLAIMER:** The following program standards are **NOT** a comprehensive list of regulations governing the COC- and ESG-funded programs described within. Programs should consult the relevant Code of Federal Regulations (CFR) governing their funding source (CoC or ESG) and their grant contract for additional regulatory guidance.

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## BACKGROUND AND PURPOSE

The U.S. Department of Housing and Urban Development (HUD) Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009. The HEARTH Act reauthorizes the McKinney-Vento Homeless Assistance Act of 1987, but with some important changes.

The overall goal of the HEARTH Act is to make homelessness rare, brief, and non-recurring by reducing the duration of time people spend homeless and reducing recidivism back into homelessness. Currently, the Polk County Continuum of Care (PCCoC) has funding through the Emergency Solutions Grants (ESG) Program and the Continuum of Care (CoC) Program to undertake projects that work toward this goal.

The [Emergency Solutions Grant \(ESG\) Interim Rule, 24 CFR 576](#), was published on December 5, 2011 and took effect on January 4, 2012. An updated version of the ESG Interim Rule was published in the Federal Register on April 1, 2017 incorporating the addition of section 576.409 regarding protections for victims of domestic violence, dating violence, sexual assault or stalking which were established in response to the Violence Against Women Reauthorization Act of 2013. The purpose of the regulation is to:

- Change the name of the program from the Emergency Shelter Grant program to the Emergency Solutions program;
- Place greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness;
- Expand the homelessness prevention component of the program; and
- Create a new rapid rehousing component.

24 CFR 576.400(e)(3) of the ESG Interim Rule requires the recipient to have written standards for providing ESG assistance and must consistently apply those standards for program participants. At a minimum, these written standards must include:

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG);
- Standards for targeting and providing essential services related to street outreach;
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see § 576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);
- 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 rehousing assistance;

- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- 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 rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

The [Continuum of Care \(CoC\) Interim Rule, 24 CFR 578](#), was published on July 31, 2012 and took effect on August 30, 2012. The purpose of the regulation is to:

- Consolidate the Supportive Housing Program (SHP), Shelter Plus Care Program (SPC) and the Section 8 Moderate Rehabilitation Program;
- Codify the CoC structure & process
- Promote a community wide commitment to the goal of ending homelessness;
- Provide funding to quickly rehouse homeless individuals and families while minimizing trauma and dislocation;
- Promote access to and effective utilization of mainstream benefits;
- Optimize self-sufficiency;

The CoC Interim Rule, provides regulatory guidance on the implementation of the CoC program. 24 CFR 578.7(a)(9) mandates that the PCCoC establish and consistently follow written standards for providing Continuum of Care assistance, in consultation with recipients of the [Emergency Solutions Grant \(ESG\) Program](#), (i.e., the City of Des Moines' Community Development Department). At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals 'and families 'eligibility for assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance; and
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

**The goals of the written standards are to:**

- Development of written policies and procedures so the ESG and CoC-funded projects, as well as the PCCoC, are in compliance with 24 CFR 576 (ESG interim rule) and 24 CFR 578 (CoC Program interim rule),
- Program accountability to individuals and families experiencing homelessness.
- The uniformity of RRH practices and participants' expectations of and experiences in RRH programs.
- Project staff competence and training specific to the target population being served.
- Model policy guidelines for RRH programs.

- Consistency among all providers of RRH assistance and their baseline knowledge of best practices, no matter the funding stream.
- Make the local performance measures transparent to the sub-recipients of the funds.

Under the purview of HUD regulations and guidelines, the PCCOC, in consultation with the City of Des Moines’ Community Development Department, has the discretion to set local standards regarding rental assistance amounts, length of assistance available for participants, and other project components as necessary.

All projects receiving CoC Program and/or ESG Program funds must comply in full with the applicable standards described in this manual. Additionally, all recipients and subrecipients of this funding must meet all minimum requirements in the CoC interim rule.

Recipients and sub-recipients of CoC Program and ESG funds may develop additional standards for administering program assistance, **but these additional standards cannot be in conflict with those established by the CoC Program Interim Rule and by the PCCoC in this document. In addition, projects may not establish additional eligibility requirements beyond those specified here and those required by other funders, including but not limited to: Department of Human Services, Runaway and Homeless Youth and the Veteran’s Administration.**

## PROGRAM OVERVIEW

### EMERGENCY SOLUTIONS GRANT PROGRAM

The [Emergency Solutions Grant Interim Rule](#) broadened existing emergency shelter and homelessness prevention activities, placing greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness by expanding prevention as an eligible use and adding a rapid rehousing component. ESG funds are authorized and intended for rapid re- housing, homelessness prevention, and emergency shelter. The interim rule updated the annual action plan requirements to include written standards for the provision of ESG assistance and performance standards for evaluating ESG activities.

ESG funds can be used for a variety of services, including: HMIS, Street Outreach, Emergency Shelter and Rapid Rehousing which includes short- or medium-term Rental Assistance, Housing Search and Placement, Utility Arrears, and Housing Stability Case Management. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. The City of Des Moines’ Community Development Department is the Recipient of ESG funds and grants the funds to eligible organizations referred to as subrecipients.

At the present time, ESG funds are only being awarded for the Emergency Shelter and Rapid Rehousing components. Written standards for homeless outreach and homeless prevention will be developed in the future should the decision be made by the PCCoC and City of Des Moines to fund one or both of those ESG components.

### CONTINUUM OF CARE PROGRAM

The CoC Program funds projects that provide housing and supportive services to households with and without children experiencing homelessness. Projects funded under the CoC Program seek to assist households with

attaining and sustaining permanent housing as quickly as possible. CoC Program funds are currently used in the PCCoC to support Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), Joint Transitional Housing- Rapid Rehousing (TH-RRH) for youth, Homeless Management Information System (HMIS), and Supportive Services Only for Coordinated Intake (SSO-CI) projects.

## STANDARDS FOR ALL PROJECT TYPES

The PCCoC practices a person-centered model that strongly incorporates participant choice and inclusion, including, but not limited to, persons experiencing chronic homelessness, single adults and childless couples, veterans, youth ages 18-24 (and parenting youth ages 18-24), households with children, victims of domestic violence or other life-threatening interpersonal violence, and households with members who have HUD-defined disabilities.

## GUIDING PRINCIPLES

The following Guiding Principles are expected to be incorporated in the policies of, and followed by, agencies being funded with local ESG and/or CoC grants.

### HOUSING FIRST

- *Housing First* is a programmatic and systems approach that prioritizes providing permanent housing to people experiencing homelessness quickly without preconditions or service participation requirements, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life.

#### Core Elements of Housing First at the Project Level

***Few to no programmatic prerequisites to permanent housing entry*** – People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety<sup>1</sup>, completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the program. People are also not required to first enter a transitional housing program in order to enter permanent housing

***Low barrier admission policies*** – Permanent supportive housing’s admissions policies are designed to “screen-in” rather than screen-out applicants with the greatest barriers to housing, such as having poor credit or financial history, no or very low income, poor or lack of rental history, past evictions, or minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”<sup>2</sup>

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<sup>1</sup> Per HUD guidance, Recovery programs at a project level can limit entry to persons who are not currently using drugs or alcohol and are committed to living in a sober environment. The key component to staying aligned with Housing First, as a systems approach, is that the participant has sought out this type of program versus it being the only option presented to them. Additionally, Recovery programs should accept participants at any stage of their recovery and have minimal barriers to entry so that income requirements, criminal records, or eviction histories are not required for program entry

<sup>2</sup> “Housing readiness” is when a project subordinates access to permanent housing with other requirements:

**Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability** - Tenants are not required to participate in services as a condition of program entry or ongoing tenancy. Supportive services are proactively offered to help tenants achieve and maintain housing stability. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information. Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants' lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.

**Practices and policies to prevent lease violations and evictions** – Housing First supportive housing programs should incorporate practices and policies that prevent lease violations and evictions among tenants. For instance, program policies consistent with a Housing First approach do not consider alcohol or drug use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with illegal activity (e.g. selling illegal substances.) Housing First models may also have policies that give tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant's income. For example, rather than moving towards eviction proceedings due to missed rent payments, programs may allow tenants to enter into payment installment plans for rent arrearages, or offer money management assistance to tenants. Every effort is made to provide a tenant the opportunity to transfer from one housing situation or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

- People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy, and building and apartment units include special physical features that accommodate disabilities.
- Housing and service goals and plans are highly tenant-driven.
- Projects that cannot serve a household work through the coordinated entry process to ensure that the household has access to other housing and services such as: prevention assistance, homeless dedicated housing and services, and community-based affordable housing.

## HOUSING FOCUSED

- Assistance provided to households at-risk of or experiencing homelessness is focused on moving to and maintaining permanent housing.

## PERSON-CENTERED

- A trauma-informed approach that is dignified, safe, and incorporates participant choice is utilized.
  - o Assistance is allocated effectively and efficiently, linking households as quickly as possible to the most appropriate intervention to achieve:
    - a. A reduction in the number of households experiencing homelessness
    - b. A Reduction in the length of time households experience homelessness
    - c. A Reduction in returns to homelessness (recidivism)

## POSTIVE YOUTH DEVELOPMENT (PYD)

PYD is an intentional, prosocial approach that engages youth within their communities, schools, organizations, peer groups, and families in a manner that is productive and constructive; recognizes, utilizes, and enhances young people's strengths; and promotes positive outcomes for young people by providing opportunities, fostering positive relationships, and furnishing the support needed to build on their leadership strengths. Positive Youth Development entails:

- Physical and psychological safety and security
- Clear expectations for behavior, as well as increasing opportunities to make decisions, to participate in governance and rule-making, and to take on leadership roles as one matures and gains more expertise
- Emotional and moral support
- Supportive adult relationships
- Opportunities to form close, durable human relationships with peers that support and reinforce healthy behaviors
- A sense of belonging and personal value
- Opportunities to develop positive social values and norms
- Opportunities for skill building and mastery
- Opportunities to develop confidence in their abilities to master their environment
- Opportunities to make a contribution to their community and to develop a sense of mattering

## STRENGTHS-BASED

- An asset-based approach that focuses on the inherent strengths of participants and deploys these personal strengths to aid in the achievements of the participants' goals. Specifically:
  - Every individual, group, family, and community has strengths.
  - Trauma, illness, and struggle may be injurious, but they may also be sources of challenge and opportunity.
  - There is no limit to a person's growth, achievement, or success.
  - We best serve participants by collaborating with them.
  - Every environment is full of resources.
  - Strong links between families, schools, and broader community resources

## FAIR HOUSING AND EQUAL OPPORTUNITY

All programs receiving CoC or ESG funds must comply with the [Polk County Continuum of Care Board's Nondiscrimination Policy](#). Additional compliance is required with the non-discrimination and equal opportunity provisions of Federal civil rights laws as specified at [24 C.F.R. 5.105\(a\)](#), including, but not limited to the following:

- [Fair Housing Act](#)
- Section 504 of the Rehabilitation Act
- Title VI of the Civil Rights Act
- Title II of the Americans with Disabilities Act

- HUD’s Equal Access Rule
- Local law and state laws

- **[Affirmatively Furthering Fair Housing](#)**

Organizations receiving CoC Program and ESG Program funding must have non-discrimination policies in place and shall provide housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability. Further, these organizations shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws.

Programs can access the City of Des Moines’ Analysis of Impediments (found [here](#)) as a local effort to address Affirmatively Furthering Fair Housing

- **Integration and Accessibility ([Fair Housing and Equal Opportunity](#))**

Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. Organizations shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible.

- **Reasonable Accommodations and Modifications for Persons with Disabilities**

Organizations are required to provide reasonable accommodations and modifications for persons with disabilities. For federally-funded housing, the recipient is responsible for paying for the modification. Organizations must inform applicants during the intake process of their right to request a reasonable accommodation or modification. A reasonable modification is a structural change, and a reasonable accommodation is change to rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space. An example of a reasonable modification is installing a grab bar in the bathroom of a person with a disability, while examples of reasonable accommodations include, permitting a person with a disability to have a service animal.

Reasonable accommodation also includes for “assistance animals” and should be assessed and documented per [HUD’s Office of Fair Housing and Equal Opportunity Notice FHEO-2020-01](#).

- **Discrimination Based on Actual or Perceived Gender**

HUD’s [Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule \(Equal Access Rule\)](#) requires that HUD’s housing projects be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. The rule defines “gender identity” to mean “actual or perceived gender-related characteristics.” The final rule also prohibits owners and administrators of HUD-assisted or HUD- insured housing, approved lenders in an FHA mortgage insurance program, and any other recipients or subrecipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing.

There is a limited exception to this rule: Temporary, emergency shelters and other buildings and facilities that are not covered by the Fair Housing Act because they provide short-term, temporary accommodations to adults without children may provide sex-segregated accommodations, which they sometimes do to protect the privacy and security of individuals when the buildings and facilities have physical limitations or configurations that require shared sleeping quarters or shared bathing facilities. For purposes of this rule, shared sleeping quarters or shared bathing facilities are those that are designed for simultaneous accommodation of multiple individuals in the same space. For example, a single-user bathing facility with a

lock on the door is not designated for simultaneous occupancy by multiple individuals, so it is not a “shared bathing facility” for purposes of the Equal Access Rule or this rule.

**Organizations should ensure that its services do not isolate or segregate victims of domestic violence based upon actual or perceived gender identity.**

- **Discrimination Based on Household Composition**

Organizations cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any member of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household.

Projects that serve households with children must serve **all types of households with children**, including households with children that are headed by a single adult or consist of multiple adults who reside together. Additionally, projects that serve households without children must serve **all types of households without children**, including households with multiple adults who reside together.

*Family* includes

- a pregnant woman with or without a partner who has no other children, or
- a women, or a man, with or without a partner who has no children with them but have children in temporary foster care<sup>3</sup>

- **Preventing Family Separation**

The age and gender of a child under age 18 shall not be used as a basis for denying any family’s admission to a CoC or ESG-funded project.

- **Guidance for Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities**

Under regulations at [24 CFR 5.105\(a\)\(2\)](#) and clarified in [HUD Notice: CPD-15-02](#), organizations operating ESG-single-sex emergency shelters (or other ESG- and/or CoC facilities) may not make a determination about services for one participant based on the complaints of another participant when those complaints are based on a participant’s gender identity or non-conformity with gender stereotypes. The organizations must take reasonable steps to address safety and privacy concerns; the organization should provide for privacy in bathrooms and dressing areas. For instance, organizations may install privacy curtains or partitions. When deciding how to house a victim of domestic violence, an organization that provides sex-segregated housing may consider on a case-by-case basis whether a particular housing assignment would ensure the victim’s health and safety. A victim’s own views with respect to personal safety deserve serious consideration. The organizations should ensure that its services do not isolate or segregate victims of domestic violence based upon actual or perceived gender identity.

- **Prioritized Subpopulations and Fair Housing Implications**

Organizations shall comply with applicable civil rights laws, including the [Fair Housing Act](#). Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness. Subpopulations may be prioritized as long as doing so does not discriminate against any

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<sup>3</sup> See PCCoC’s [Temporary Foster Care Q&A](#) for additional guidance.

protected class under federal nondiscrimination laws (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless households); subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project (e.g., substance use disorder treatment, domestic violence services, or a high intensity package of services designed to meet the needs of hard-to-reach homeless persons).

o *Dedicated versus Prioritized*

Projects and/or beds that are dedicated to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving households experiencing chronic homelessness must continue serving those households). This means that if two otherwise eligible households are seeking admission into the program, one who falls within the designated prioritized subpopulation and one who does not, the household who is in the designated prioritized subpopulation must be given priority for admission.

If there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, organizations should not hold the unit vacant, but instead should serve the next prioritized subpopulation who may benefit from the services being provided.

o *Fair Housing Implications*

The Local Standards establish priority subpopulations by project type (i.e., Permanent Supportive Housing); organizations may not set more restrictive priorities. For instance, while a Permanent Supportive Housing project may prioritize households experiencing chronic homelessness with a qualifying disability per the Local Standards, beds may not be reserved for persons with a specific disability (i.e. physical disability). If an individual, who is otherwise qualified, but who does not have a physical disability, seeks admission and would benefit from the services offered, this person may not be excluded from the project. Organizations may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

Per the federal Fair Housing Act as well as state law and local ordinances, households with children may not be categorically screened out from housing. This means that a housing project may prioritize households without children, but may not limit eligibility for the project to households without children. If a household with children is otherwise eligible for a project, the household must be offered housing in the project.

## VIOLENCE AGAINST WOMEN ACT (VAWA)

Organizations shall comply with the PCCOC's [Violence against Women Act Implementation in ESG and CoC Funded Programs](#) policy which reflect HUD's regulations implementing the law. The policy include a number of requirements:

- Notifying all program participants (current and future) of their rights under VAWA;
- Providing all participants (current and future) with a self-certification form, to have in case needed;
- Including a lease provision/addendum with all VAWA requirements in all leases with participants; and
- Establishing Rental Assistance Agreements or Contracts with all third-party housing owners, or revising current agreements or contracts, to ensure compliance with VAWA obligations.

VAWA protections mean that survivors of domestic violence, dating violence, sexual assault, or stalking:

- Cannot be denied admission to emergency housing, safe havens, transitional housing, or permanent housing programs because they are or have been victims or threatened victims;
- Cannot be evicted, lose federal rental assistance, or have emergency housing assistance terminated because they are or have been victims or threatened victims;
- Cannot be denied admission or rental assistance, evicted, terminated, or lose a rental subsidy for reasons related to the abuse, such as bad credit history and criminal history;
- May remain in housing, at least temporarily, if their abuser is evicted; and
- Must be able to move or “transfer” to another subsidized unit to protect their safety and keep their affordable housing.

## HOMELESS SERVICES COORDINATION

### CENTRALIZED INTAKE PARTICIPATION

**Policy:** The PCCoC shall have procedures in place for evaluating individuals’ and families’ eligibility for ESG and CoC-fund assistance.

- All CoC and ESG-funded programs are required to participate in the Polk County Continuum of Care (PCCoC) Centralized Intake System. Consistent with PCCoC policies, all ESG- funded projects will rely on service, shelter and housing placements as a result of a completed assessment and referral from the Centralized Intake staff. Participation requires following all established policies and procedures outlined in the [Centralized Intake System for Homeless Assistance Policy and Procedures](#).

**Procedure:** All CoC and ESG-funded programs are required to submit, as part of their application, a completed and signed Centralized Intake Verification form to affirm their project’s participation within the Polk County Centralized Intake System.

- The program will accept referrals exclusively from the Centralized Intake System;
- The appropriate program staff have read the Centralized Intake Policies and Procedures and understand their organization’s obligations with regard to the centralized intake
- In an instance where a referral from the Centralized Intake is denied, the program will comply with the Referral Rejection section of the Centralized Intake System Policies and Procedures.
- The program will notify the Centralized Intake staff, in a timely manner, of open units.

### RAPID RESOLUTION

**Policy:** The PCCoC shall have procedures in place to divert households in an immediate housing crisis by accessing alternatives to entering emergency shelter or the experience of unsheltered living.

**Procedure:** Prior to referring household seeking emergency services, such as shelter, to Centralized Intake (CI), all CoC and ESG-funded programs must engage the household in a Rapid Resolution conversation in an attempt to resolve their immediate housing need.

- Rapid Resolution training shall be provided by the PCCoC. Trainings shall be conducted by a contracted trainer or someone who has undergone the “train-the-trainer” training.
  - CoC and ESG-funded programs must ensure that relevant staff attend an initial training and be retrained every three years.

- The [Rapid Resolution Interaction form](#) shall be completed and submitted to CI following each Rapid Resolution conversation.
- Requests for financial assistance to resolve an immediate housing need should be made to CI.
  - The Rapid Resolution Interaction form must be submitted to CI before consideration will be given to requests for financial assistance.

## HOMELESS MANAGEMENT INFORMATION SYSTEM

**Policy:** All CoC and ESG-funded programs must participate in the Homeless Management Information System(HMIS), commonly known as Wellsky Community Services (formerly ServicePoint), administered by the Institute for Community Alliances. Only programs that are specifically forbidden by other statutes or regulations (e.g. domestic violence victim service providers) may not participate.

- In the PCCoC, victim services providers are required to use the comparable database, DVMIS.

**Procedure:** All CoC and ESG-funded programs shall collect and maintain common data fields as directed by the Institute for Community Alliances, considering all relevant regulations.

- The relevant program staff who are first-time HMIS users shall participate in an introductory Wellsky Community Services training.
- The relevant program staff shall also participate in subsequent trainings following data field or system changes as directed by the Institute for Community Alliances.
- Program staff shall enter data in a manner such that it meets the PCCoC Board’s data completeness and quality standards.
- Program staff shall enter data in a manner such that it meet’s the PCCoC Board’s data timeliness standards.
- Program staff not meeting either the data completeness and quality standards or the data quality standards shall participate in additional Wellsky Community Services trainings as need to meet these data standards.

## PARTICIPANT INCLUSION

- Each CoC-funded project is expected to engage participants in ongoing program evaluation and quality improvement processes. Toward that end, at a minimum, each project is required to survey or interview participants at least annually to obtain feedback on program service quality, the housing and service environment, and opportunities for improvement.
- Per the CoC Interim rule, all recipients and sub-recipients of CoC Program funding are required to provide for the participation of at least one homeless or formerly homeless individual on the board of directors of other equivalent policymaking entity. An advisory or tenant committee that makes recommendations to the recipient’s or subrecipient’s board, but itself does not make decisions, is not considered an equivalent policymaking entity.

## ACCESS TO MAINSTREAM RESOURCES

- The PCCoC expects every organization funded through the CoC or ESG Programs to coordinate with and access mainstream and other targeted homeless resources.

- Organizations should assess and assist participants with obtaining any mainstream resource for which they may be eligible for, including: TANF, Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Federally Qualified Health plan (Affordable Care ACT), CHIP, SSI/SSDI, Workforce Investment funds, and Welfare-to-Work.
- Where possible, organizations should streamline processes for applying for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step.
- Per the PCCoC's [CoC Program Competition Application Guidelines](#), every organization funded with CoC funds is expect to have at least one SOAR trained staff person. Additionally, SOAR trained staff are expected to undergo retraining every 2 years.

## EDUCATION OF HOMELESS CHILDREN AND YOUTH

- All CoC- and ESG-funded projects shall follow the procedures set forth in the PCCoC's [Education of Homeless Children and Youth](#) policy ensuring all children and unaccompanied youth are enrolled in school, or in early childhood programs, and are connected to appropriate education related services in the community.

## TERMINATION AND GRIEVANCE PROCEDURES

- Organizations must have a written grievance procedure, including a formal process for participants to provide feedback.
- Organizations must have a written termination policy outlining project rules and termination processes, including a formal due process.
- Terminations may only occur in the most severe circumstances, which include, but are not limited to: consistent failure to make rental payments or adhere to a repayment schedule, consistent violation of the lease, or destruction of property.
- Termination from a project should not prohibit the household from being readmitted into the program at a future date.
- The termination process, at a minimum, must consist of:
  - o Providing the participant with a written copy of the rules and the termination process before the participant begins to receive assistance;
  - o Written notice to the program participant containing a clear statement of the reasons for termination: *e.g. lease obligations, tenant payments, damage to the property;*
  - o A review of the decision, in which the program participant is given the opportunity to present written or oral objections/ appeal before a person other than the person (or a subordinate of that person) who made or approved the termination decision; Do we want to be specific and require a person(s) outside the agency to hear the appeal?
  - o Prompt written notice of the final decision to the program participant

## POLICIES AND PROCEDURES FOR ESG AND COC-FUNDED ASSISTANCE

Unless otherwise stated, policies and procedures in this section that reference Rapid Rehousing (RRH) shall apply to the RRH portion of a Joint TH-RRH program.

## EVALUATING ELGIBILITY FOR ASSISTANCE

**Policy:** The PCCoC shall have procedures in place for evaluating individuals' and families' eligibility for ESG and CoC-fund assistance **Procedure:** Evaluating a household's eligibility for both ESG and CoC-funded programs shall occur at the Centralized Intake.

### OUTREACH (ESG)

- The Individual or family must be "homeless" as defined by the following categories of the Homeless Definition Final Rule:
  - Category 1: Literally Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence

### HOMELESSNESS PREVENTION (ESG)

- The Individual or family must be "homeless" as defined by the following categories of the Homeless Definition Final Rule:
  - Category 2: Imminent Risk of Homelessness
  - Category 4: Fleeing/Attempting to Flee Domestic Violence;

**OR**

- The individual or family must be "at-risk of homelessness" as defined by the following At-Risk of Homelessness Definition categories found in the Homeless Definition Final Rule:
  - Category 1: Individuals and Families
  - Category 2: Unaccompanied Children and Youth
  - Category 3: Families with Children and Youth

**AND**

- An individual or family who:
  - Has an annual income below 30% of the median family income for the Des Moines Metropolitan Statistical Area; **AND**
  - Does not have sufficient resources to prevent them from moving to an emergency shelter or another place defined in Category 1: Literally Homeless of the Homeless Definition Final Rule;

### EMERGENCY SHELTER (ESG)

- The Individual or family must be "homeless" as defined by the following categories of the Homeless Definition Final Rule:
  - Category 1: Literally Homeless
  - Category 2: Imminent Risk of Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence

### RAPID REHOUSING (ESG)

- The individual or family must be "homeless" as defined by the Homeless Definition Final Rule:
  - Category 1: Literally Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence
- The individual or family must have annual income below 30% of Area Median Income

## RAPID REHOUSING (CoC)

- Excluding projects funded under the DV Bonus, Joint TH-RRH and RRH for youth, individuals or families who meet the following criteria may be served by CoC-funded RRH projects
  - Category 1: Literally Homeless;
  - Receive services through a VA-funded homeless assistance program and met the criteria under “homeless”, above, at initial intake to the VA’s homeless assistance system.
- DV Bonus
  - Category 4: Fleeing/Attempting to Flee Domestic Violence
  - Receive services through a VA-funded homeless assistance program and met the criteria under “homeless”, above, at initial intake to the VA’s homeless assistance system.

## TRANSITIONAL HOUSING (JOINT TH-RRH) AND RAPID REHOUSING FOR YOUTH

- Unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) must be “homeless” as defined by the following categories of the Homeless Definition Final Rule:
  - Category 1: Literally Homeless
  - Category 2: Imminent Risk of Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence
- Additionally, unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence are eligible to be served by a youth-serving provider.
- As provided by the Consolidated Appropriations Act, 2019, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under this NOFA.

## PERMANENT SUPPORTIVE HOUSING (CoC)

- The Individual or family must be “homeless” as defined by the following categories of the Homeless Definition Final Rule:
  - Category 1: Literally Homeless;
  - Category 4: Fleeing/Attempting to Flee Domestic Violence
- PSH is dedicated to households (single individuals, couples without children, or families with children) experiencing chronic homelessness, as defined by HUD.
- PSH projects have the following additional NOFA limitations on eligibility within Category 1:
  - Individuals and Families coming from TH must have originally come from the streets, emergency shelter, or safe haven
  - Projects that are dedicated to serving households experiencing chronic homelessness, including those that were originally funded as Samaritan Bonus Initiative Projects, must continue to serve chronically homeless persons exclusively
  - Projects funded under the Permanent Supportive Housing Bonus must continue to serve the homeless population outlined in the NOFA under which the project was originally awarded.

## DOCUMENTING HOMELESSNESS

**Policy:** The PCCoC shall have procedures in place for documenting individuals’ and families’ eligibility for ESG and CoC-fund assistance.

**Procedure:** Documenting individuals’ and families’ eligibility for ESG and CoC-fund programs will occur in the following manner:

#### CENTRALIZED INTAKE (CI)

- CI staff shall use the Eligibility Verification Form developed for the ESG program which contain the criteria to document the eligibility standards for each program type met by an individual or family applying for ESG funded services as well as acceptable evidence to establish and verify the individual or family meet the applicable eligibility standards.
  - o If the individual/family is determined to be ineligible for homelessness prevention services or rapid rehousing, documentation must reflect the reason for ineligibility.
- At the time they go through CI, the individual or family requesting ESG-funded assistance must present evidence to establish and verify they meet the applicable eligibility standards described in the Eligibility Verification Form developed for the ESG program for which they are applying for assistance.
  - o The determination of homeless or at-risk of homeless status shall always be documented in writing and maintained in the individual’s or family’s case file.
  - o The order of preference for documenting an individual’s or family’s homeless or at-risk of homeless status shall be:
    - i. Third-party documentation, including written & source documentation or HMIS records
    - ii. Intake work observations
    - iii. Certification from the person seeking assistance
- Utilizing other forms of already available documentation shall also be acceptable evidence of an individual or family’s homeless status. Already available documentation shall include certification or other appropriate service transactions recorded in Wellsky Community Services as well as discharge paperwork to verify a stay in an institution of 90 days or less
- Where third-party documentation is not obtainable, a written record of the case manager’s due diligence in attempting to obtain the evidence and certification by the head(s) of household seeking assistance shall be maintained in the family’s case file.
- Where required, the determination of income eligibility shall be documented (see interim rule on documenting income) and maintained in the individual’s or family’s case file.
- Upon documenting eligibility, a Homeless Verification letter, documenting the name(s) of the individual(s) or family members and the category of homelessness status, shall be uploaded into the individual’s or family’s Wellsky Community Services record.

#### ESG-FUNDED PROGRAMS (Emergency Shelter & Rapid Rehousing)

- Download the Homeless Verification letter from the individual’s or family’s Wellsky Community Services record.
- Complete the Eligibility Verification Form indicating the criterion that defines the individual’s or family’s homeless status based on the Homeless Verification letter provided by the centralized intake.
- The Homeless Verification letter shall be attached to the Eligibility Verification Form and placed in the individual’s or family’s case file.

#### ESG-FUNDED PROGRAMS (Outreach & Homelessness Prevention)

- Organizations must document the individuals’ or families’ eligibility at intake and at re-evaluation using the following standards:

- o An Eligibility Verification Form shall be completed at intake indicating the criterion that defines the individual's or family's homeless status as well as the type(s) of evidence relied upon to establish and verify the individuals' or family's homeless status.
- o The individual or family requesting homelessness prevention assistance or rapid rehousing must present evidence to establish and verify they meet the applicable eligibility standards.
  - i. The determination of homeless or at-risk of homeless status shall always be documented in writing and maintained in the individual's or family's case file. The order of preference for documenting an individual's or family's homeless or at-risk of homeless status shall be:
    - Third-party documentation
    - Intake work observations
    - Certification from the person seeking assistance
  - ii. Utilizing other forms of already available documentation shall also be acceptable evidence of an individual or family's homeless status. Already available documentation shall include:
    - Certification or other appropriate service transactions recorded in Wellsky Community Services
    - Discharge paperwork to verify a stay in an institution of 90 days or less.
  - iii. Every attempt shall be made to obtain third-party documentation of homeless/at-risk of homeless status. In lieu of third-party documentation, a written record of due diligence shall be noted in the corresponding section of the Eligibility Verification form that includes the date(s) documentation was sought, the type(s) of documentation sought, the source(s) from whom the documentation was sought, and a description of the response received from each attempt to obtain the documentation.
  - iv. All documents used to establish and verify an individual's or family's homeless/at-risk of homeless status shall be attached to the Eligibility Verification Form and placed in the individual's or family's case file.
- o Where required, the determination of income eligibility shall be documented per 24 CFR 576.500(e)(1-4) and maintained in the individual's or family's case file.

#### CoC-FUNDED PROGRAMS

- Document eligibility according to [HUD recordkeeping requirements at 24 CFR 578.103](#) for the CoC Program.

#### PRIORITIZATION FOR ASSISTANCE

**Policy:** The PCCoC shall have procedures in place for determining and prioritizing which eligible individuals' and families will receive ESG and CoC-fund assistance.

**Procedure:** Determining which eligible individuals and families will receive assistance from ESG and CoC-funded programs shall occur in the following manner:

#### ESG-FUNDED PROGRAMS (Emergency Shelter & Rapid Rehousing) and CoC-FUNDED PROGRAMS

- Prioritization will occur at the Centralized Intake and be consistent with the policies and procedures outlined in the [PCCoC's Centralized Intake System for Homeless Assistance Policies and Procedures](#).

#### ESG-FUNDED PROGRAMS (Homelessness Prevention)

- Any household that may otherwise be eligible for prevention assistance under ESG must also meet the "but for" rule – that is, "Would this individual or family be homeless but for this assistance?"

- The “but for” rule can be documented with the following:
  - o Certification by the individual or head of household that no subsequent residence has been identified; **AND**
  - o Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
- Furthermore, any household that qualifies for prevention assistance and meets the “but for” rule must also have the following qualifications:
  - o Have no more than three months of arrears; and
  - o Demonstrated an ability to sustain housing; and
  - o Demonstrate an ability to earn income; and
  - o Would remain in housing that is decent, safe, sanitary, and affordable.
- If the household cannot meet the above qualifications, it is reasonable to infer that the household is in greater need than prevention assistance can provide for, and the household will be referred to a more appropriate program.

## DETERMINING PROGRAM LENGTH AND TIME PERIOD FOR RENTAL ASSISTANCE

**Policy:** The PCCoC shall have procedures in place for determining the program length of each ESG/CoC-funded program component and how long a particular program participant will be provided rental assistance.

**Procedure:** Program length and the length of time a particular program participant will be provided rental assistance will be as follows:

### EMERGENCY SHELTER (ESG)

- Each ESG-funded emergency shelter shall develop policies and procedures for:
  - o The number of days families or individuals served by the program may remain in shelter as well as any grounds for extending shelter stay;
  - o Discharge from emergency shelter
  - o Assessing, prioritizing and reassessing an individuals’ or families’ needs for essential services related to emergency shelter.

### RAPID REHOUSING (CoC & ESG) and HOMELESSNESS PREVENTION (ESG)

- The PCCoC requires the program length for RRH to be:
  - o No less than six months and no more than 18 months for both CoC and ESG-funded RRH as well as ESG-funded Homelessness Prevention.
- The minimum standards for determining how long a participant shall be provided with rental assistance are as follows:
  - o Participants shall receive approval for the minimum amount of financial assistance necessary to end their homelessness.
  - o Approval for rental assistance shall be granted in no more than three month increments.
    - Participants shall not be approved for more rental assistance than can be justified given their current income and expenses.
    - Financial need must be documented in the participant’s file each time their assistance is evaluated.
  - o Generally, RRH assistance shall not be provided to an individual or family for more than 24 of the months in any 36-month period.

- The process used to transition the household off of financial assistance must be coordinated with case management efforts that help the household assume and sustainably cope with their housing costs.

#### JOINT TH-RRH

- The agency administering the program must provide both units supported by the transitional housing component and the tenant-based rental assistance as well as services provided through the PH-RRH component to all program participants.
  - A program participant, however, may choose to receive only the transitional housing unit, or the assistance provided through the PH-RRH component.
- Maximum program length for the TH component cannot exceed 24 months.
  - The primary objective of transitional housing is to move a household from homelessness to permanent housing as quickly as possible; assistance in transitioning to permanent housing must be made available/provided as quickly as possible from transitional housing program entry.
- Maximum program length for the RRH component cannot exceed 24 months.
- Program participants may only receive up to 24 months of TOTAL TH-RRH assistance.
- The minimum standards for determining how long a participant shall be provided with rental assistance for RRH are the same listed above under “RAPID REHOUSING”.

#### PERMANENT SUPPORTIVE HOUSING

- There can be no predetermined length of stay for a PSH project.
- Program recipients shall receive rental assistance as long as they remain in the PSH project.
- After at least three years in the PSH project, program recipients shall be assessed, per [PCCoC’s Move-On Policy](#), as to their ability to move from PSH to another housing assistance program.
  - Moving to another housing assistance program is purely voluntary. A PSH program participant cannot be forced to move to **another housing assistance program**.

### DETERMINING PARTICIPANTS CONTRIBUTION TOWARD RENT AND UTILITY COSTS

**Policy:** The PCCoC shall have procedures in place for determining a participant’s contribution toward rent and utility costs

**Procedure:** The amount of a participant’s contribution toward rent and utility costs will be as follows:

A participant’s total contribution toward rent and utilities must be universally and consistently applied to all participants served in CoC- and ESG-funded RRH programs.

#### EMERGENCY SHELTER (ESG)

- ESG-funded emergency shelters may not charge participants any program fees.

#### HOMELESSNESS PREVENTION (ESG)

- At initial assessment, client’s share of rent and utilities shall be zero. At re-evaluation, client’s share shall equal 30% of household income.
  - Each individual program is allowed to have general criteria by which they determine a program participant’s share of rent and/or utilities in an ESG-funded program. However, in no case shall a program participant’s share of rent plus utilities exceed 30% of their income (income verification

shall be in accordance with [24 CFR 5.609](#) and [24 CFR 5.611\(a\)](#).

## RAPID REHOUSING

- Participants are not required to contribute rent.
- Rental assistance should be provided in a flexible and progressive manner that is tailored to the household's needs. To the extent possible, programs shall decrease the subsidy as the household's length of time in the RRH program increases.
  - During the first three months of program enrollment, the participant shall contribute \$0.00 toward rent.
  - During the last 3 months of program enrollment, the participant shall contribute at least 50% of their income toward rent.
  - Programs are expected to provide hardship exemptions from any rental charges if such charges could lead to loss of housing for the assisted household.
- RRH projects are to calculate rent as the sum of the total monthly rent for the unit and, reasonable utility costs when costs are included as part of the rental payment to the landlord, or if the tenant pays separately for utilities, the monthly allowance for utilities established in accordance with [HUD CPD Notice 17-11](#).
  - ESG-funded programs may pay utility deposits and payments (up to 24 months) including up to 6 months for payment in arrears.
  - CoC-funded programs may pay a utility deposit as well as reasonable utility costs that are included as part of the rent payment.
- In no case shall a program participant's share of rent plus utilities exceed 30% of their income.
- A household's monthly subsidy amount should be based on the household's size, composition, and income; reasonable in relation to rents being charged for comparable units.
  - The income of program participants, in CoC- and ESG-funded programs, must be calculated in accordance with [24 CFR 5.609](#) and [24 CFR 5.611\(a\)](#).
- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants.
- The participant's income shall be verified prior to their approval for initial and additional financial assistance. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the participant's project file. This file shall also contain the participant's plan to remain housed when their assistance comes to an end, by increasing income, decreasing expenses, or both.
- A program participant's eligibility for RRH assistance will be evaluated not less than once annually.
  - At a minimum, the reevaluation must establish that
    - The program participant does not have an annual income that exceeds 30% of AMI for the household size; and
    - The program participant lacks sufficient resources and support necessary to retain housing without RRH assistance.
- Each RRH project must establish policies concerning notification of changes in participants' income or family composition.

## PERMANENT SUPPORTIVE HOUSING

- PSH projects are to calculate rent as the sum of the total monthly rent for the unit and, reasonable utility costs when costs are included as part of the rental payment to the landlord, or if the tenant pays separately for utilities, the monthly allowance for utilities established in accordance with [HUD CPD Notice 17-11](#).

- A household's monthly subsidy amount should be based on the household's size, composition, and income; reasonable in relation to rents being charged for comparable units (Rent Reasonableness).
  - The income of program participants, in CoC- and ESG-funded programs, must be calculated in accordance with [24 CFR 5.609](#) and [24 CFR 5.611\(a\)](#).
- The participant's income shall be verified initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the participant's project file.

## RENTAL PAYMENTS AND FINANCIAL ASSISTANCE

**Policy:** The PCCoC shall have procedures in place for determining when rental and other financial assistance will be paid.

**Procedure:** Minimum standards for determining when rental and other financial assistance will be paid:

### RENTAL PAYMENTS

#### Rapid Rehousing

- Payments for rental assistance shall comply with applicable HUD standards.
  - In ESG-funded RRH projects, rental assistance may cover up to the FMR for a unit and units must comply with HUD's rent reasonableness standards.
  - For CoC-funded RRH, rent reasonableness is the applicable rent standard and units in a structure must comply with HUD's rent reasonableness standard.
- Payments for rental assistance shall be made only when:
  - There is a legally binding, written lease between the unit's owner and the participant. For participants receiving tenant-based rental assistance (TBRA) under the CoC Program, the lease must be for an initial term of no less than 1 year, must be renewable for a minimum term of 1 month, and may only be terminable for cause. For participants receiving project-based rental assistance (PBRA) under the ESG Program, the lease must have an initial term of 1 year. There is no minimum lease period for TBRA under ESG. This requirement for a lease does not apply to payments made for rent arrears by ESG-funded RRH providers.
  - There is a rental assistance agreement between the RRH provider and the unit's owner, which sets forth the terms under which rental assistance will be provided, including the requirements specified above. The rental assistance agreement must include a requirement that the owner provide the grantee with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and must include the same payment due date, grace period, and late-payment penalty requirements as are in the participant's lease.
- Payments shall be made only for units that have been inspected for HUD Housing Quality Standards (CoC-funded RRH) or Habitability Standards (ESG-funded RRH) and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet these standards.
- Lead-based paint requirements must be evaluated for any chipped, cracking, or peeling paint. All tenants with children under the age of 6 who are in housing built prior to 1979 are required to be given a lead-based paint pamphlet and to certify that they received the pamphlet. A copy of this certification must be placed in the participant's file.

### Limitations on Tenant-Based Rental Assistance

When TBRA is provided, the rental assistance agreement with the unit owner shall be terminated without further payments if

- The participant moves out of the unit, or
- The lease terminates and is not renewed.

### **Permanent Supportive Housing**

- Payments for rental assistance shall comply with applicable HUD standards.
  - For CoC-funded PSH, rent reasonableness is the applicable rent standard and units in a structure must comply with HUD's rent reasonableness standard.
- Payments shall be made only under the following conditions for Sponsor-Based Rental Assistance:
  - Sponsor-based rental assistance is provided through contracts between the recipient and sponsor organization, a lease between the sponsor and the landlord and a sublease between the sponsor and the program participant.
  - A sponsor may be a private, nonprofit organization, or a community mental health agency established as a public nonprofit organization.
  - Program participants must reside in housing owned or leased by the sponsor.
- Payments shall be made only for units that have been inspected for HUD Housing Quality Standards (CoC-funded RRH) and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet these standards.
- Lead-based paint requirements must be evaluated for any chipped, cracking, or peeling paint. All tenants with children under the age of 6 who are in housing built prior to 1979 are required to be given a lead-based paint pamphlet and to certify that they received the pamphlet. A copy of this certification must be placed in the participant's file.

### FINANCIAL ASSISTANCE (RRH)

- Financial assistance should be provided in amounts sufficient to ensure the likelihood of positive housing outcomes after the assistance has ended.
- Financial assistance provided to participants under ESG- and CoC-funded RRH programs may not exceed the limitations set forth in **Appendix C**.

## HOUSNG STABILIZATION AND/OR RELOCATION SERVICES

**Policy:** The PCCoC shall have procedures in place for determining the type, amount and duration of housing stabilization and/or relocation services.

**Procedure:** The minimum standards for determining the type, amount and duration of housing stabilization and/or relocation services to provide to program participants as are follows:

### **Eligible Services:**

- Eligible services that ESG and CoC-funded RRH projects may provide to help program participants in locating, obtaining and retaining suitable permanent housing can be found in **Appendix C**, Housing Services & Related Services.

**Minimum Program Requirements:**

- The program must offer a standard, basic level of support to all landlords who lease to program households. This support must be detailed in a written policy distributed to landlords.
- The program must have a detailed policy covering the type, amount and duration of assistance provided to help households find and secure housing.
  - Program staff must explain and distribute this policy to households upon entry to the program.
- The program must also have a written policy that requires staff to explain to household's basic landlord-tenant rights and responsibilities and the requirements of their specific lease.
- The program must provide households with multiple housing choices within practical constraints.
- The program must help households make informed housing choices with the goal that the household will be able to maintain their housing after leaving the program.
- The program must issue checks quickly and on time and must have the capacity to track payments to landlords and other vendors.
- The program must have the capacity to pay reasonable back rent and utility arrears that directly prevent a household from being able to sign a lease. Rent arrears cannot be paid once they are in collections

## HOUSNG STABILITY CASE MANAGEMENT

**Policy:** The PCCoC shall have procedures in place for assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability

**Procedure:** The minimum standards for assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability as are follows:

**Eligible Services:**

- Eligible case management and supportive services that ESG and CoC-funded RRH projects may provide to participants can be found in **Appendix C**.
  - ESG-funded RRH: Case management services provided to a program participant seeking permanent housing can only be provided for up to 30 days.
  - CoC-funded RRH: Supportive services may be provided for no longer than 6 months after the RRH rental assistance has stopped.
- Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations, shall be determined by the individual service provider's policies and clearly communicated to participants.

**Minimum Program Requirements** (Unless otherwise identified, requirements apply to PSH, RRH & TH-RRH):

- Case managers must **actively** help program participants to find housing as quickly as possible including working closely with the CI housing navigator to match the household to an appropriate unit.
- Case managers shall be trained on RRH case management strategies and related evidence-based practices as well as on program policies and community resources. (RRH & TH-RRH)
- Case managers are expected to meet with participants in their homes and must have a minimum of one contact per month with participants. All contact between case managers and participants shall be documented in case notes.
- Case managers must respect participants' homes as they do their own, scheduling appointments ahead of time, only entering when invited in, and respecting personal property and the participant's wishes.

- Programs must have clear safety procedures for home visits. They must train their staff on these procedures, post the procedures in a clearly visible manner in their offices, inform participants about the procedures at intake, and, if and when changes are made, communicate the changes to participants and staff.
- Programs must have clearly defined, or actively be working to establish, relationships with employment and income programs that they can refer participants to when appropriate.
- Programs must have clearly defined policies and objective standards about when case management should be continued and ended.
- At enrollment or within 72 hours of enrollment, the case manager must conduct a tenancy barriers assessment.
- Case managers must connect participants to community resources that help them to (1) resolve or navigate tenant problems that landlords may screen for on rental applications, (2) obtain necessary documentation, (3) prepare for successful tenancy, and (4) successfully accomplish other move-in activities.
- The case manager must offer opportunities for participants to learn basic tenancy skills.
- The case manager must work directly with the household and landlord to resolve tenancy issues without threatening the household's tenancy.
- When appropriate, case managers should work with participants to build their communication skills so they can better respond to or negotiate with a landlord.
- When necessary, case managers should help households avoid evictions and maintain positive relationships
- Housing plans for individual participants should focus on how the participant can maintain a lease and address barriers to housing retention; on improving the participant's understanding of landlord/tenant rights and responsibilities; and on addressing other issues that have, in the participant's past, resulted in housing crises or housing loss.
- Case managers should make referrals to appropriate community and mainstream resources as needed.

## PROGRAM OPERATIONS POLICIES

**Policy:** The PCCoC shall ensure that policies and procedures have been established by ESG and COC-funded projects which are consistent and uniform across program components to ensure program participants receive the same type, amount and duration of services.

**Procedure:** The minimum standards for assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability as are follows (Unless otherwise identified, requirements apply to PSH, RRH & TH-RRH):

- Case managers' job, or similar position, descriptions must direct them to focus on housing and to use strengths-based and trauma informed practices.
- The program must offer a standard, basic level of support to all landlords who lease to program households. This support must be detailed in a written policy.
- The program must have a detailed policy covering the type of assistance provided to help households find and secure housing. Program staff must explain and distribute this policy to households upon entry to the program. The program must also have a written policy that requires staff to explain to household's basic landlord-tenant rights and responsibilities and the requirements of their specific lease.

- The program must have clearly defined policies and procedures for determining the amount of financial assistance provided to a household, as well as defined and objective standards for determining when case management and financial assistance should continue and end (RRH & TH\_RRH).
- The program must have clearly defined, written standards for participant assessments and intake, determination of participants' eligibility, initial evaluation (certification) of participants, reevaluation (recertification) of participants, terminating assistance, appeals of terminations, emergency transfers under the Violence Against Women Act (VAWA), and participant files.
- When households are expected to pay an amount toward their housing, the program must have written policies and procedures for determining that amount and communicating it to the participant.
- A progressive approach must be used to determine the duration and amount of rental assistance. Policies detailing this approach should cover decision-making guidelines and reevaluation processes (RRH & TH-RRH).

### EMERGENCY SHELTER (ESG)

ESG-funded emergency shelters must establish policies and procedures for:

- Admission
- Rapid resolution
- Referral
- Discharge
- Standards regarding length of stay, if any
- 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
- Assessing, prioritizing and reassessing individuals' and families' needs for essential services related to emergency shelter; and
- Documenting the shelter's compliance with HUD Habitability Standards.

### TRANSITIONAL HOUSING (CoC)

Transitional housing programs that only receive operations funds through HUD's Continuum of Care Program must establish policies and procedures to ensure that participants reside in decent, safe and sanitary housing.

- These policies and procedures must include:
  - The process by which each housing unit will be inspected for HUD Housing Quality Standards by a City of Des Moines inspector at initial program startup and every time a youth moves out and before another youth moves into the unit.
  - The process for ensuring the housing unit will remain compliant with HQS during a youth's occupancy, including how damages or needed repairs are reported and addressed.
- Failure to have the unit(s) inspected at startup or prior to a new youth moving in will result in non-payment of the program's reimbursement request.

## PERFORMANCE MEASURES BY COMPONENT TYPE

Performance measures are developed by the PCCoC Board's Performance Committee and submitted to the board for approval. Progress toward performance measures are reviewed quarterly by the Performance Committee. If necessary, the Performance Committee will annually recommend to the board new performance measures or adjustment in the targets of current performance measures.

### CURRENT PERFORMANCE MEASURES FOR ESG EMERGENCY SHELTER

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 7 days
- Exit Destination Errors
  - Single ES: Total destination error rate <65%
  - Family ES: Total destination error rate <10%
- Successful Exits/Retention
  - Single ES: 15%
  - Family ES: 65%

### CURRENT PERFORMANCE INDICATORS FOR COC TRANSITIONAL HOUSING

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 7days
- Exit Destination Errors
  - Total destination error rate < 10%

### CURRENT PERFORMANCE MEASURERS FOR COC RAPID REHOUSING

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 10 days
- Exit Destination Errors
  - Less than 10%
- Average Length of Time from Enrollment to Housing Move-In
  - Goal is 30 days
- Successful Exits
  - 80% of program participants will successfully exit to permanent housing
- Income Increases
  - 25% of all adult participants will increase total income from entry to exit

### CURRENT PERFORMANCE MEASURERS FOR COC PERMANENT SUPPORTIVE HOUSING

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 7days
- Exit Destination Errors
  - Less than 5%
- Average Length of Time from Enrollment to Housing Move-In
  - Goal is 30 days
- Successful Retention
  - 90% of program participants will successfully exit to/retain permanent housing

- Income Increases
  - 25% of all adult participants in PSH will increase total income

## EMERGENCY SOLUTIONS GRANT UNDER THE CARES ACT

The following are waivers, alternate requirements and statutory flexibilities for existing ESG-funded eligible activities authorized by Notice: CPD-20-08, Issued: September 1, 2020 and pertaining to these program standards:

### SHORT-TERM AND MEDIUM-TERM RENTAL ASSISTANCE

- (i) 24 CFR 576.106(a)(2), where medium-rent is defined as “for more than 3 months but not more than 24 months of rent” is waived and an alternative requirement is established where medium-term is established as for more than 3 months but not more than 12 months.
- (ii) The requirement at 24 CFR 576.106(d) that prohibits rental assistance where the rent for the unit exceeds the Fair Market Rent established by HUD, as provided under 24 CFR Part 888, is waived so long as the rent complies with HUD’s standards of rent reasonableness, as established under 24 CFR 982.507.

**APPENDIX A: HUD HOMELESS DEFINITION CATEGORIES**

Category	Definition	Required Documentation
<p><b>Category 1 – Literally Homeless</b></p>	<p>Household lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>a. Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u></li> <li>c. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ul>	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; or</li> <li>• Written referral by another housing or service provider; or</li> <li>• Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li> </ul> <p>For individuals exiting an institution – one of the forms of evidence above and:</p> <ul style="list-style-type: none"> <li>○ Discharge paperwork or written/oral referral, or</li> <li>○ Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution</li> </ul>
<p><b>Category 2 – Imminent Risk of Homelessness</b></p>	<p>Household will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> <li>a. Residence will be lost within 14 days of the date of application for assistance; <u>AND</u></li> <li>b. No subsequent residence has been identified; <u>AND</u></li> <li>c. Household lacks the resources or support networks needed to obtain other permanent housing</li> </ul>	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the household that they must leave; or</li> <li>• For households leaving a hotel or motel – evidence that they lack the financial resources to stay; or</li> <li>• A documented and verified oral statement; and</li> <li>• Certification that no subsequent residence has been identified; and</li> <li>• Self-certification or other written documentation that the household lacks the financial resources and support necessary to obtain permanent housing</li> </ul>

Category	Definition	Required Documentation
<b>Category 3 – Homeless under other Federal Statutes</b>	Not Applicable in the Polk County Continuum of Care	
<b>Category 4 – Fleeing/ attempting to flee domestic violence</b>	Any household who: <ul style="list-style-type: none"> <li>a. Is fleeing, or is attempting to flee, domestic violence;</li> <li>b. Has no other residence; AND</li> <li>c. Lacks the resources or support networks to obtain other permanent housing</li> </ul>	<ul style="list-style-type: none"> <li>• <i>For victim service providers:</i> <ul style="list-style-type: none"> <li>○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker</li> </ul> </li> <li>• <i>For non-victim service providers:</i> <ul style="list-style-type: none"> <li>○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where safety is not jeopardized, the oral statement must be verified; and</li> <li>○ Certification by the individual or head of household that no subsequent residence has been identified; and</li> <li>○ Self-certification, or other written documentation, that the household lacks the financial resources and support to obtain other permanent housing.</li> </ul> </li> </ul>

## APPENDIX B: AT RISK OF HOMELESSNESS DEFINITIONS

Category	Definition
<b>Category 1 – Individuals and Families</b>	<p>An individual or family who:</p> <ol style="list-style-type: none"> <li>1. Has an annual income below 30% of median family income for the area; AND</li> <li>2. 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</li> <li>3. Meets one of the following conditions:               <ol style="list-style-type: none"> <li>(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR</li> <li>(B) Is living in the home of another because of economic hardship; OR</li> <li>(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR</li> <li>(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR</li> <li>(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR</li> <li>(F) Is exiting a publicly funded institution or system of care; OR</li> <li>(G) 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</li> </ol> </li> </ol>
<b>Category 2 – Unaccompanied Children and Youth</b>	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.
<b>Category 3 – Families with Children and Youth</b>	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

**APPENDIX C: SUMMARY OF ELIGIBLE RRH SUPPORTIVE SERVICES**

<b>Exhibit 5: Summary of Eligible RRH Supportive Services<sup>4</sup></b>		
	<b>ESG-RRH 24 CFR part 576.10</b>	<b>CoC-RRH 24 CFR part 578.53</b>
<b>Housing Services &amp; Related Services</b>	<p>Assist participants in locating, obtaining, and retaining suitable permanent housing, including:</p> <ul style="list-style-type: none"> <li>• Housing search</li> <li>• Tenant counseling</li> <li>• Understanding leases</li> <li>• Arranging for utilities</li> <li>• Making moving arrangements</li> <li>• Assessment of housing barriers, needs, and preferences</li> <li>• Development of an action plan for locating housing</li> <li>• Outreach to and negotiation with owners</li> <li>• Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness</li> <li>• Assistance with submitting rental applications</li> </ul>	<p>Assist participants in locating, obtaining, and retaining suitable housing, including:</p> <ul style="list-style-type: none"> <li>• Housing search</li> <li>• Tenant counseling</li> <li>• Understanding leases</li> <li>• Arranging for utilities</li> <li>• Making moving arrangements</li> <li>• Mediation with property owners and landlords</li> <li>• Credit counseling, accessing a free personal credit report, and resolving personal credit issues</li> <li>• Payment of rental application fees<sup>5</sup></li> </ul>
<b>Case Management</b>	<p>Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing by, for example:</p> <ul style="list-style-type: none"> <li>• Conducting the initial evaluation, including verifying and documenting eligibility</li> <li>• Using the centralized or coordinated assessment system</li> <li>• Counseling</li> <li>• Developing, securing, and coordinating services</li> <li>• Obtaining Federal, State, and local benefits</li> <li>• Monitoring and evaluating program participant progress</li> <li>• Providing information and referrals to other providers</li> <li>• Developing an individualized housing and service plan, including planning a path to permanent housing stability</li> <li>• Conducting re-evaluations</li> </ul>	<p>Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participant(s), including:</p> <ul style="list-style-type: none"> <li>• Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking</li> <li>• Using the centralized or coordinated assessment system</li> <li>• Counseling</li> <li>• Developing, securing, and coordinating services</li> <li>• Obtaining Federal, State, and local benefits</li> <li>• Monitoring and evaluating program participant progress</li> <li>• Providing information and referrals to other providers</li> <li>• Developing an individualized housing and service plan, including planning a path to permanent housing stability</li> <li>• Conducting required annual assessment of service needs (re-evaluation)</li> </ul>

<sup>4</sup> From HUD publication *Rapid Re-Housing: ESG vs. CoC*

<sup>5</sup> Administrative fee collected at lease signing and rental insurance fee are not eligible under “rental application fees”

**Exhibit 5: Summary of Eligible RRH Supportive Services**

	<b>ESG-RRH 24 CFR part 576.10</b>	<b>CoC-RRH 24 CFR part 578.53</b>
<b>Legal Services</b>	<p>Costs of resolving a legal problem that prohibits a program participant from obtaining or retaining permanent housing. Legal services or activities include <b>client intake</b>, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions:</p> <p>(a) <b>Eligible Billing Arrangements.</b> ESG funds may be used only for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys.</p> <p>Costs may be based on:</p> <ul style="list-style-type: none"> <li>• Hourly fees</li> <li>• Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees</li> </ul> <p>(b) <b>Ineligible Billing Arrangements.</b> Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements.</p> <p>(c) <b>Eligible Subject Matters.</b> Landlord/tenant matters; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants.</p> <p>(d) <b>Ineligible Subject Matter.</b> Legal services related to immigration and citizenship matters or related to mortgages.</p>	<p>Costs of legal advice and representation in matters that interfere with the homeless individual's or family's ability to obtain and retain housing. Legal services or activities include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions:</p> <p>(a) <b>Eligible Billing Arrangements.</b> CoC funds may be used for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys.</p> <p>Costs may be based on:</p> <ul style="list-style-type: none"> <li>• Hourly fees</li> <li>• Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees</li> </ul> <p>(b) <b>Ineligible Billing Arrangements.</b> Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements.</p> <p>(c) <b>Eligible Subject Matters.</b> Landlord tenant disputes; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants.</p> <p>(d) <b>Ineligible Subject Matter.</b> Legal services related to immigration and citizenship matters or related to mortgages and homeownership.</p>
<b>Moving Costs</b>	Costs such as truck rental or hiring a moving company, including payment of temporary storage fees for up to 3 months	Reasonable <b>one-time</b> moving costs, including truck rental and hiring a moving company
<b>Utility Deposit</b>	Standard utility deposit that the utility company requires of all customers	Payment of utility deposit, which constitutes a one-time fee paid to utility companies

<b>Exhibit 5: Summary of Eligible RRH Supportive Services</b>		
	<b>ESG-RRH 24 CFR part 576.10</b>	<b>CoC-RRH 24 CFR part 578.53</b>
<b>Mediation</b>	Mediation between the program participant and the owner or person(s) with whom the participant is living	Mediation with property owners and landlords on behalf of eligible program participants
<b>Credit Repair</b>	<ul style="list-style-type: none"> <li>• Credit counseling</li> <li>• Accessing a free personal credit report</li> <li>• Resolving personal credit problems</li> <li>• Other services needed to assist with critical skills related to household budgeting and money management</li> </ul>	<ul style="list-style-type: none"> <li>• Credit counseling</li> <li>• Accessing a free personal credit report</li> <li>• Resolving personal credit issues</li> </ul>
<b>Additional Supportive Services Eligible under CoC-RRH ONLY</b>		
<b>Child Care</b> The costs of establishing and operating child care and providing child care vouchers for children from families experiencing homelessness		
<b>Education Services</b> The costs of improving knowledge and basic educational skills		
<b>Employment Assistance and Job Training</b> The costs of establishing and operating employment assistance and job training programs		
<b>Food</b> The cost of providing program participants with meals or groceries		
<b>Life Skills Training</b> The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness but that are necessary to function independently in the community		
<b>Mental Health Services</b> The direct outpatient treatment of mental health conditions by licensed professionals		
<b>Outpatient Health Services</b> The direct outpatient treatment of medical conditions by licensed medical professionals		
<b>Outreach Services</b> Activities to engage persons for the purpose of providing immediate support and intervention and for identifying potential program participants		
<b>Substance Abuse Treatment Services</b> The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing		
<b>Transportation</b> Costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other eligible services		

## APPENDIX D: COMMON TERMS, ACRONYMS AND DEFINITIONS

**Area Median Income (AMI)** – AMI is based upon income data for the state and local jurisdiction in which a household resides, and is dependent on the size of the household. The AMI for each state and county can be found at: <http://huduser.org/DATASETS/il.html>.

**Case Manager** – The staff person assigned to assist a program participant in obtaining and/or maintaining permanent housing through needs assessment, coordination of services and advocating on behalf of the participant.

**Centralized Intake** – Polk County Continuum of Care’s coordinated entry system to provide a single “front door” for homeless individuals and families seeking shelter and assistance. The system includes common intake, assessment and prioritization tools and process, referrals and placement decisions based on client needs, inventory of resources for emergency shelter, housing and services, and consistent opportunities for prevention or diversion to appropriate resources, supportive services and permanent housing.

**Chronically Homeless (HUD definition):**

- (1) A “homeless individual with a disability,” as defined in the Act, who:
  - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
  - Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
- (2) An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition before entering that facility; or
- (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

**Continuum of Care (CoC)** – A collaborative planning body designed to address homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs. It is the body responsible for meeting the goals of HUD’s Continuum of Care Program.

**Emergency Shelter (ES)** – A facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for persons experiencing homelessness.

**Fair Market Rent** – Based on the Department of Housing and Urban Development’s estimate of the amount of money a property would rent or lease for if it was available at this time based on the county and state the property is located in. Fair market rent is based upon 24 CFR 888 and 24 CFR 982.503.

**Homeless Management Information System (HMIS)** – A computerized data collection system that stores information about persons experiencing homelessness, collected throughout the community from the various agencies that provide services to these individuals. Client-level information collected from

each program can be aggregated with data from other programs using a unique client identifier to determine unduplicated system wide information, such as the overall level of homelessness, service effectiveness, and unmet community needs.

**Joint TH and PH-RRH Component Project** – The Joint TH and PH-RRH component project combines two existing program components – transitional housing and permanent housing-rapid rehousing – in a single project to serve individuals and families experiencing homelessness. Program participants may only receive up to 24 months of total assistance.

**Living in Unsafe Situations** – unaccompanied youth aged 24 and under and families headed by youth aged 24 and under who have an unsafe primary nighttime residence and no safe alternative to that residence.

**Permanent Supportive Housing (PSH)** – Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

**Program Participant** – An individual (including an unaccompanied youth) or family who is assisted with Continuum of Care and/or ESG program funds.

**Rapid Re-Housing (RRH)** – An intervention that rapidly connects families and individuals experiencing homelessness to permanent housing through housing identification, rent and move-in assistance, and case management and services.

**Rapid Resolution** – An intervention designed to empower persons facing imminent homelessness to identify safe and appropriate housing options (other than the street/car/shelter), and assisting them in avoiding shelter and returning immediately to housing. Rapid Rehousing emphasizes the use of services, problem-solving conversations, and financial assistance to help households be diverted from homelessness or rapidly exit homelessness.

**Rent Reasonableness** – Rents must be compared to other unassisted units in similar locations within the marketplace per 24 CFR 982.507.

**Victim Service Provider** – A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

**Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT)** – evidence-based screening tool used to determine prioritization for case management, housing programs, and/or referrals. The VI-F-SPDAT is utilized for family screening and TAY-SPDAT is used for transition age youth (16-24 years old).

**Youth –Serving Provider** - a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under.