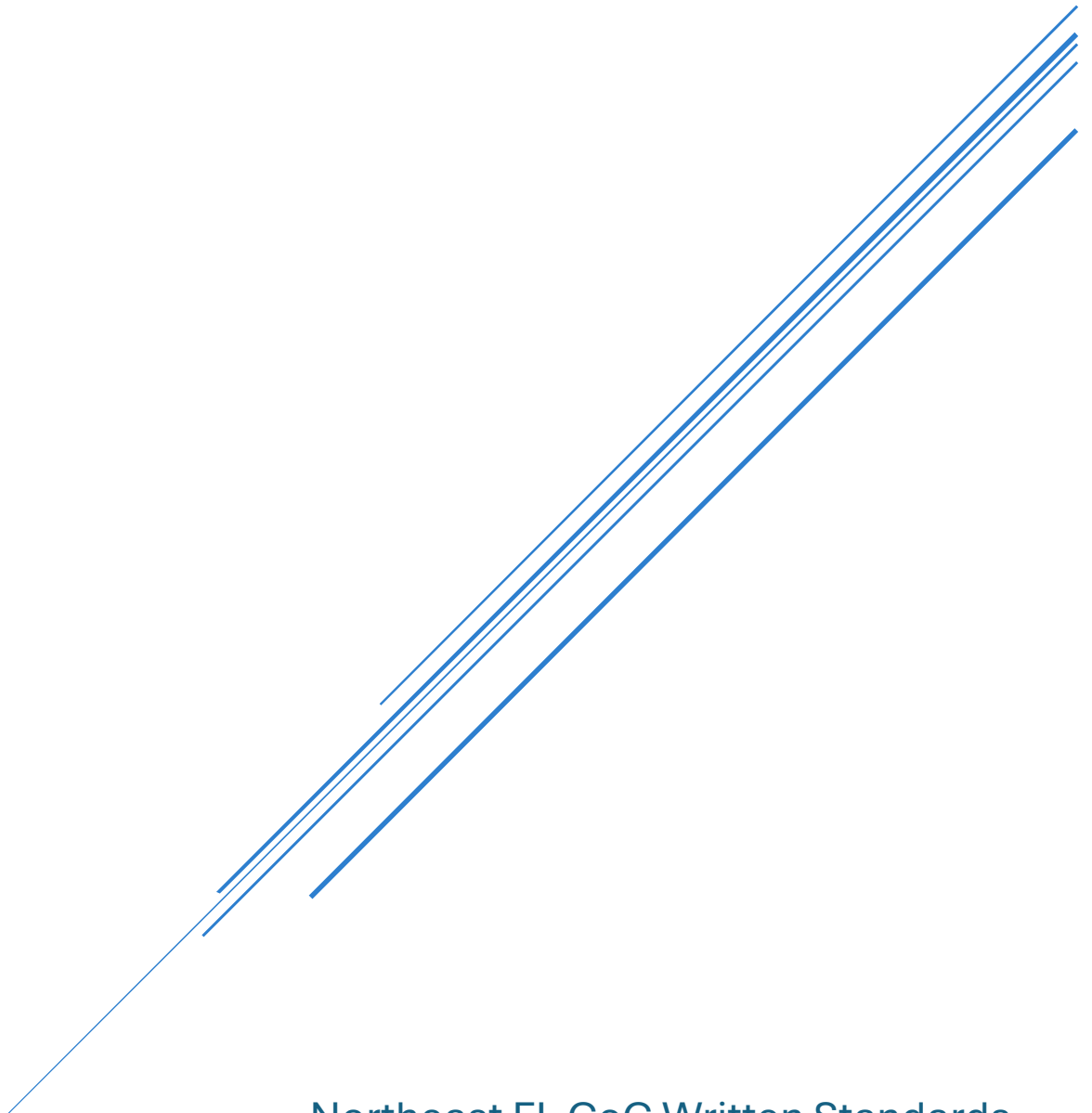


NORTHEAST FLORIDA CONTINUUM OF CARE (FL-510)

“Written Standards”



Northeast FL CoC Written Standards
Update: June, 2025

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PREAMBLE

The Continuum of Care (CoC) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of Duval, Clay, and Nassau counties. Both the Emergency Solution Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules state that the Continuum of Care (CoC), in consultation with recipients of Emergency Solutions Grants program funds within the geographic area, (1) establish and consistently follow written standards for providing Continuum of Care assistance, (2) establish performance targets appropriate for population and program type, and (3) monitor recipient and sub-recipient performance.

All programs that receive ESG or CoC funding are required to abide by these written standards. The CoC strongly encourages programs that do not receive either of these sources of funds to accept and utilize these written standards.

The written standards have been established to ensure that persons experiencing homelessness who enter programs throughout the CoC will be given similar information and support to access and maintain permanent housing.

The majority of these standards are based on the ESG and/or the HEARTH Interim Rules. There are some additional standards that have been established by the CoC that will assist programs in meeting and exceeding performance outcomes that will help the CoC reach the goal of ending homelessness.

The Continuum of Care Written Standards will:

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

These written standards have been developed to allow for input on standards, performance measures and the process for full implementation of the standards throughout the CoC from the prospective of those organizations that are directly providing homeless housing and services, Emergency Shelter (ES), Transitional Housing (TH), Permanent Supportive Housing (PSH), Rapid Re-Housing (RRH) and Outreach.

The CoC Written Standards have been approved by the CoC , DCF, ESG recipients and providers. The Written Standards will be reviewed and revised as needed at a minimum of

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once per year. Revisions that would affect the Coordinated Entry process would be made as soon as possible. Agreement to abide by the Written Standards will be a condition of being moved forward for CoC or ESG funding.

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

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

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

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

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

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

Key Acronyms

- BNL – By Name List
- CE/CES – Coordinated Entry/Coordinated Entry System
- CoC – Continuum of Care
- DCF – FL Department of Children and Families
- DV – Domestic Violence
- ES - Emergency Shelter
- ESG – Emergency Solutions Grant
- FL-510 – HUD code for the Northeast FL - CoC
- HIC – Housing Inventory Count
- HMIS – Homeless Management Information System (HMIS)
- HP – Homeless Prevention
- HPS – Housing Problem-Solving
- HUD – U.S. Department of Housing and Urban Development
- NOFO – Notice of Funding Opportunity
- PIT – Point in Time Count
- PSH – Permanent Supportive Housing
- PWLE – People with Lived Experience/Expertise
- RHAB – Regional Homeless Advisory Board
- RRH – Rapid Rehousing
- SO - Street Outreach
- SPM – System Performance Measures
- SSO -Supportive Services Only
- SSO-CE – Supportive Services Only Coordinated Entry
- TH – Transitional Housing
- TH-RRH – Transitional Housing Rapid Rehousing Joint Component
- YAB – Youth Action Board
- YHDP – Youth Homelessness Demonstration Program

GENERAL STANDARDS FOR ALL PROJECTS

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

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

CONFLICT OF INTEREST CoC-funded projects must follow 24 CFR 578.954 related to conflicts of interest. ESG projects are expected to follow the conflict-of-interest standards outlined in 24 CFR 576.4045 related to the provision of ESG assistance, and procurement of goods and services

COORDINATED ENTRY (CE) PARTICIPATION

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

- Serve exclusively participants who are referred to them via the Coordinated Entry case conferencing process; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES; and
- Bring all housing openings to case conferencing; and
- Follow the CoC’s Order of Priority

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

- Provide the Access, Diversion, and Assessment phases of CES; and
- To the extent the project is funded to do so: provide the Prevention and Rapid Exit phases of CES; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES; and
- Participate in their Region’s Street outreach network, if applicable
- **ESG-funded Emergency Shelter projects are expected to participate in CE in the following ways:**

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

ESG-funded Homelessness Prevention projects expected to participate in CE to the fullest extent possible, which may include:

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

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

COC PARTICIPATION All CoC recipients are required to participate in CoC-wide meetings, technical assistance meetings and required CoC trainings. The CoC’s Lead Agency will notify grantees of trainings via CoC mailing list and will indicate which trainings are required vs. optional. CoC-funded programs should also participate in CoC subcommittees and/or ad hoc workgroups as appropriate. ESG-funded programs are encouraged to participate in any of the above as well and may be required to participate as directed by their funder. CoC Recipients are expected to communicate all CoC training and meeting opportunities with their subrecipients and encourage subrecipient participation.

DIVERSION All Access Point, Street Outreach, and Emergency Shelter projects will attempt to return the participant to safe housing using Diversion techniques as part of the housing problem-solving (HPS) approach to services. This can include strengths-based problem-solving conversations, identifying community supports, and offering lighter touch solutions. For participants who are unable to return to safe housing via Diversion, Coordinated Entry access point staff will attempt to return the participant to safe housing using Rapid Exit techniques as part of HPS. Persons/Projects referring participants to ES or CE should be encouraged to explore alternatives to shelter prior to making a referral, whenever possible. This will require coordination with those operating other prevention Projects.

EDUCATION FOR CHILDREN AND YOUTH EXPERIENCING HOMELESSNESS All CoC projects will designate a staff person to be responsible for ensuring that children being

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

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

Project start date in HMIS is based on project type :

- **Street Outreach:** Date of first contact with the client.
- **Emergency Shelter:** Night the client first stayed in the shelter. Night by Night (NbN) shelters will have a ‘Project Start Date’ and will allow clients to re-enter as necessary without “exiting” and “restarting” for each stay for a specified period.
- **Transitional Housing:** Date the client moves into the residential project (i.e., first night in residence).
- **Permanent Housing**, including Rapid Re-Housing: Date the client was admitted into the project. To be admitted indicates the following factors have been met: **1.** Information provided by the client or from the referral indicates they meet the criteria for admission; **2.** The client has indicated they want to be housed in this project; and **3.** The client is able to access services and housing through the project. The expectation is the project has a housing opening (on-site, site-based, or scattered-site subsidy) or expects to have one in a reasonably short amount of time.
- **Other Service Projects** (including but not limited to: Services Only, Day Shelter, Homelessness Prevention, Coordinated Entry): Date the client first began working with the project and generally received the first provision of service.

[FY 2024 HMIS Data Standards Manual](#)

ENVIRONMENTAL REVIEW All CoC-funded projects (unless exempt) are required to complete an environmental review per 24 CFR 578.317. However, per 24 CFR 576.407(d)8 , ESG activities will require some level of environmental review & clearance. No funds may be expended until an environmental review that meets the standards outlined in 24 CFR

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589 has been submitted and approved by PA Department of Community and Economic (DCED)

[Environmental Review Procedures - 24 CFR 58 - HUD Exchange](#)

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

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

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

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- Affirmative Outreach. 24 CFR 578.93(c)16 for CoC-funded and 24 CFR 576.407(b)17 for ESG-funded requires that projects must affirmatively market housing and supportive services to eligible persons--regardless of race, color, national origin, religion, sex, age, familial status, or handicap--who are least likely to apply in the absence of special outreach and maintain records of those marketing activities. To ensure the CE process assists CoC Project and ESG Project recipients in meeting the Affirmatively Furthering Fair Housing requirement, Northeast FL - CoC is committed to providing marketing resources, auxiliary aids and other services necessary to ensure effective communication with persons accessing the homeless response system, which includes ensuring that information is provided in appropriate accessible formats as needed, such as Braille, audio, large type, assistive listening devices, and sign language interpreters, as well as accommodation for persons with limited English proficiency. Resources will be developed and made available by the CoC designated Lead Agency and marketing plans described within the CE Policy and Procedure Manual. Housing assisted by HUD and made available through the CoC must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2).
- A recipient must implement its Projects in a manner that affirmatively furthers fair housing, which means that the recipient must:
 - Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;
 - Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective Project participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and
 - Provide Project participants with information on rights and remedies available under applicable federal, State, and local fair housing and civil rights laws.
- Accessibility and integrative housing and services for persons with disabilities. Recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR 10018), Section 504 of the Rehabilitation Act of 1973 (24 CFR 819), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR 3520 and 3621). In accordance with the requirements of 24 CFR 8.4(d)22, recipients must ensure that their Project’s housing and supportive

services are provided in the most integrated setting appropriate to the needs of persons with disabilities.

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

Required Documentation is as follows:

- A provider is entitled to obtain information that is necessary to evaluate if a requested reasonable accommodation may be necessary because of a disability. If a person's disability is obvious, or otherwise known to the provider, and if the need for the requested accommodation is also readily apparent or known, then the provider may not request any additional information about the requester's disability or the disability-related need for the accommodation.
- If the requester's disability is known or readily apparent to the provider, but the need for the accommodation is not readily apparent or known, the provider may request only information that is necessary to evaluate the disability-related need for the accommodation.
- If the requesters disability is not obvious or the need for the request is not obvious, a housing provider may request reliable disability-related information that (1) is necessary to verify that the person meets the Act's definition of disability (i.e., has a physical or mental impairment that substantially limits one or more major life activities), (2) describes the needed accommodation, and (3) shows the relationship between the person's disability and the need for the requested accommodation

- Guidance for Creation of Nondiscrimination and Fair Housing Policies. All provider agencies, including assessment centers are required to uphold and provide to the CoC-designated CE Lead Agency with the following:
 - Verification that they have policies which ensure the agency does not tolerate discrimination and comply with all nondiscrimination, fair housing, and equal opportunity laws.
 - Verification of availability of aids and services, upon request, to ensure effective communication, such as the availability of qualified sign language interpreters, documents in Braille, or other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.
 - Verification that a Project has a reasonable accommodation policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
 - If the agency acts as a landlord, verification that the agency has a reasonable modification policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
 - Verification that the agency has a complaint procedure to provide to the Project participant to report discrimination.
- **HMIS PARTICIPATION** All Projects, apart from projects operated by Victim Service Providers (VSPs), must enter data into HMIS accurately and in a timely manner (defined as within 7 days). Projects operated by VSPs must enter data into a comparable database accurately and in a timely manner and make their aggregate data available to the CoC for planning, monitoring and ranking. Projects should use this data to measure project outcomes and identify areas for improvement. Non-CoC and non-ESG-funded projects are also encouraged to track project data using HMIS or a DV comparable database. Projects should reference the most updated HMIS Policies and Procedures for additional guidance (HMIS users can find this in the ClientTrack “HMIS Reading Materials folder”).

HOUSEHOLDS WITH CHILDREN For projects that serve households with children:

- Projects must take the educational needs of children into account when families are placed in housing and to the maximum extent practicable, and place families with

children as close as possible to their school of origin so as not to disrupt such children’s education.

- A staff person must be designated as the educational liaison that will ensure that children are enrolled in school, connected to appropriate services in the community, including early childhood Projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services.
- Projects are prohibited from denying assistance to or separating members of a family with children based on gender or age

See HUD FAQ # 152924, which is relevant to this requirement.

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

- Admission/participant screening and selection practices are based on HUD eligibility, promote the acceptance of applicants/not screening participants out, and are not based on preconditions.
- Projects must allow entry to applicants regardless of their income, current or past substance use, completion of treatment, history of victimization (e.g., domestic violence, sexual assault, childhood abuse), criminal record—except restrictions imposed by federal, state, or local law or ordinance (e.g., restrictions on serving people who are listed on sex offender registries), poor credit or financial history, poor or lack of rental history, eviction history, or willingness to participate in supportive services.
- Supportive services are voluntary, housing-focused, and emphasize engagement and problem solving over therapeutic goals. Service plans are housing-focused and highly participant driven without predetermined goals, meaning plans are determined by the needs, wishes, and preferences of the participant. Projects must not require participation in supportive services or progress on goals for continued tenancy, occupancy, or participation in the project.
- Participation in services or project compliance is not a condition of PSH. RRH Projects may require monthly case management as a condition of receiving rental

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assistance. Housing First is not “housing only.” While it is acceptable for projects to require all participants to meet with a case manager, a participant must not be evicted from, or terminated from, the project for failure to meet with the case manager.

- Per HUD, “If following a Housing First approach, **it is acceptable to require all program participants to meet with a case manager, but it is not acceptable to require participation in supportive services.** It is important to note that the purpose of any case management should be to engage the program participant. Additionally, a program participant must not be evicted from, or terminated from, the program for failure to meet with the case manager.”
- Leases or occupancy agreements cannot have stipulations that would not be found outside of a standard rental agreement.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered reason for eviction by the Agency. Receiving approval from the CoC, agencies may adopt a “no use or consumption” on property rule.
- The project prioritizes those with the highest need for services (in accordance with CE policies and procedures), rather than “first come/first served”
- Case managers/service coordinators are trained in and actively employ evidence-based practices for participant engagement such as motivational interviewing and person-centered counseling.
- Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and/or addiction are a part of participants' lives, where participants are engaged in nonjudgmental communication regarding drug and alcohol use, and where participants are offered education regarding how to avoid risky behaviors and engage in safer practices.

[Housing_First_Checklist_FINAL.pdf](#)

[CoC and ESG Additional Requirements - Case Management - HUD Exchange](#)

INCORPORATING THE EXPERTISE OF PERSONS WITH LIVED EXPERIENCE (PWLE):

Each recipient and subrecipient of CoC/ESG funding must, to the maximum extent possible, involve persons with lived experience/expertise of homelessness into project design/delivery, as well as involvement through employment; volunteer services; or otherwise in operating or providing supportive services for the project.

- CoC-funded projects:
 - Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided²⁷.
 - This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with persons with lived experience/ expertise of homelessness when considering and making policies and decisions.
 - At the project level, provider organizations are expected to create their own plans and strategies for incorporating the expertise and perspectives of PWLE into project design and delivery. CoC recipients or subrecipients should take substantive actions to incorporate the input and expertise of persons with lived experience of homelessness into program design, implementation, and improvement. Substantive actions are those that are likely to result in an observable or measurable impact on agency operations or programming. This may include, but is not limited to:
 - Establishing program- or agency- level advisory boards specifically composed of PWLE (who may be current or past participants of the agency) and who also participate in the broader governance;
 - Surveying program participants regularly for their feedback on the programs they have participated in;
 - Recruiting, hiring and actively supporting PWLE to work at all levels within their organization, including providing appropriate training and opportunities for advancement.

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

- ESG-funded projects must follow 24 CFR 576.40528.

The provisions requiring homeless participation on boards or in an advisory capacity can be fulfilled by ESG Grantees bringing any policy decisions regarding their facility and services to the CoC governing board where homeless participation is already existing. Also, to the maximum extent practicable, Grantees should involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG Project, and in providing services for occupants of facilities assisted with ESG.

[eCFR :: 24 CFR Part 578 -- Continuum of Care Program](#)

INSPECTIONS Rental units assisted with CoC Rental Assistance payments must meet Housing Quality Standards per 24 CFR 98229 and 24 CFR 578.7530 . ES projects that receive assistance for shelter operations are required to meet Minimum Habitability Standards. If ESG funds are used to help a project participant remain in or move into permanent housing, that housing must also meet Minimum Habitability Standards. Shelters renovated with ESG funds are also required to meet state or local government safety and sanitation standards as applicable and use energy-efficient materials including Energy Star and WaterSense products and appliances. Refer to 24 CFR 576.40331 for details on the housing standards. Moreover:

- Lead-based paint remediation and disclosure applies to all ESG-funded shelters and all housing occupied by ESG participants. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821- 484632), and the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C 4851-485633), subparts of the implementing regulations at 24 CFR 35, Subparts A, B, H, J, K, M and R34 apply to activities under this grant Project. The Grantee must also comply with the Lead, Renovation, Repair, and Painting Project Final Rule, 40 CFR 74535, where applicable

LIMITED ENGLISH PROFICIENCY All CoC- and ESG-funded projects should take reasonable steps to ensure meaningful access to their projects and activities by individuals with Limited English Proficiency, regardless of the language spoken. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Grantees must follow the requirements outlined in 24 CFR 576.407(b)36.

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HUD published Final Guidance to Federal Financial Assistance Requirements Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English.

Mainstream Benefits:

All projects must promote access to and effective utilization of mainstream benefits. Projects must have specific plans for ensuring participants will be individually assisted to obtain the benefits of mainstream health, social, and employment programs for which they are eligible to apply and that meet the needs of program participants (e.g., Medicare, Medicaid, SSI, Food Stamps/SNAP, local Workforce office, early childhood education, TANF, substance use disorder programs, employment assistance programs). Projects should be providing regular or as needed transportation assistance to attend mainstream and community resource appointments, employment training, educational programs, and jobs. Transportation assistance may include bus passes, rail/subway cards, vehicle owned by the organization, etc. Projects must follow up with participants at least annually to ensure they applied for mainstream benefits (e.g., TANF, food stamps, SSI) for which they are eligible, are receiving the benefits, and renew benefits as required. Projects must ensure participants have access to SSI/SSDI technical assistance, provided by either the project, subrecipient, or partner agency. If program participants have access to SSI/SSDI technical assistance, the staff person providing the SSI/SSDI technical assistance should have completed **SOAR** training in the past 24 months. **Note:** Only if SOAR training is still funded and available for certification

MATCHING FUNDS CoC-funded projects must follow 24 CFR 578.7338 Matching requirements. ESG-funded projects should refer to the application and regulations associated with their contract year.

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

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

- Participation in the Sheltered PIT Count entails ensuring all HMIS data is complete and up to date.

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

Prioritization:

Prioritization standards for Emergency Service Projects (HP, SO, ES, and TH) and Housing Projects (RRH and PSH) are aligned with the CoC’s Strategic Plan and HUD Policy guidance. The Northeast FL CoC CE system (CES) provides the platform for projects to adhere to the prioritization standards and follow. The CES is required to provide a tool for evaluation households’ chronicity, medical vulnerability, acuity, and ability to address their own housing instability.

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

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

CES assessment tools identified to prioritize households for assistance include: the quantitative CE assessment tool³⁹ and the qualitative Housing and Service Needs (HN/SN) Assessment. The scores generated by these assessments will be used to inform a household’s placement on the regional prioritized by-name list (BNL), along with the following criteria and data points:

- Chronic homeless status

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- Length of time (LOT) homeless
- Severity of service needs and housing needs as measured by the assessment tools

Each county’s CES housing prioritization list will be prioritized in the following way:

Priority Bracket	Criteria	Tie - Breaker
1 ST Priority	Special Population designated by the CoC	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
2 ^{NS} Priority	People experiencing chronic homelessness	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
3 RD Priority	All eligible households not included under 1 st Priority or 2 nd Priority	HN/SN Score, LOT Homeless, then CE Assessment Tool Score

As of fall 2024 the CoC is using the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the quantitative CE assessment tool. However, this is subject to change

PROJECT EVALUATION CoC projects are evaluated annually through the local CoC renewal funding competition process, as well as an annual monitoring of the program. Underperforming projects may be required to develop a quality improvement plan, receive technical assistance from the CoC, and/or have their funding reallocated in order to fund new projects, depending on the circumstances. CoC projects should refer to the CoC Funding Process and Policies. ESG projects are evaluated through the CoC/ESG quarterly monitoring reports. DCF reviews all ESG grantee invoices to ensure eligible expenses are incurred and monitors all of its ESG.

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

- Eviction by a landlord in a scattered site project should not result in termination from the ESG/CoC project.
- Projects must use judgement and examine all extenuating circumstances in determining whether a violation should result in termination. Projects should make multiple, documented attempts to bring the household into compliance with their lease or occupancy agreement. Assistance should only be terminated in the most severe cases, when no other viable alternative is available, and when interventions supporting the household to remain in the project have been unsuccessful.
- Every effort should be made to allow the participant to remain in the project.
- Projects should follow a Housing First approach which outlines the following tenets related to terminations: o Housing is not dependent on participation in services, or demonstration of progress made on a service plan. Services must be offered by staff but are voluntary for participants. While it is acceptable for projects to require all

participants to meet with a case manager, a participant must not be evicted from, or terminated from, the project for failure to meet with the case manager. Substance use in and of itself (without other lease violations) is not a reason for termination.

Note: If a project is a recovery housing model, focused on people who are in early recovery from drugs or alcohol (as outlined in HUD’s Recovery Housing Brief: <https://www.hudexchange.info/resource/4852/recovery-housing-policy-brief/>), different standards related to use and subsequent offer of treatment may apply.

- Termination does not preclude assistance at a future date.
- Termination should not result in a return to homelessness, instead households should be referred either back to the CoC’s CES for enrollment into an appropriate project or to another non-CE-related resource pursuant to their level of need.
 - **Possible reasons for termination:**
 - Termination will occur if the qualifying member of the household:
 - Is institutionalized or incarcerated for 90 days or more (PH Projects only);
 - Moves out of the service area;
 - Voluntarily exits the project; or
 - Passes away
- Termination may also occur if the participant has moved out of their unit and the project is unable to make contact with the participant. The project should make multiple attempts, using different methods (such as phone, in-person visits, and written notice) to make contact with participants.
- Participants who are repeatedly given notices from their landlord or provider organization for non-payment of their portion of the rent, damaging the unit, harassing other tenants, criminal activities, or continued lease violations despite warnings may be terminated from the project. In the spirit of the supportive aspects of homeless assistance projects, the agency will document reasonable efforts and interventions that demonstrate attempts to encourage participants’ compliance with project rules and expectations. Project termination should be seen as a last resort.
- In some severe cases (e.g., violence, or serious threats of violence, toward Project staff, volunteers or other participants/tenants; unable to live safely alone/ unsupervised in their home), termination from the project may be immediate.
- Projects with operating or leasing dollars that utilize occupancy agreements or subleases with participants must follow applicable landlord/ tenant laws when terminating a household’s assistance.

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Further per 24 CFR 576.40240 – Terminating Assistance (ESG) and 24 CFR 578.9141 (CoC):

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

TRANSFERS

Emergency Transfers:

- Projects must follow the CoC’s Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix D).
- In accordance with the VAWA, Northeast FL- CoC homeless assistance Projects providing housing or rental assistance must allow participants who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to request an emergency transfer from the participant’s current unit to another unit. This requirement applies to Projects receiving Continuum of Care (CoC) or Emergency Solutions Grant (ESG) funding. The ability to request a transfer is available regardless of sexual orientation, gender identity, sex, or marital status.

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- CoC/ESG providers will work with the Northeast FL CoC’s CES to enact an emergency transfer through resources beyond those available within the provider’s own organization. The ability of the CoC’s CES to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and on whether another dwelling unit is available and is safe to offer the participant for temporary or more permanent occupancy.
- A participant is eligible for an emergency transfer when any member of the household is a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements of the policy.
- For households receiving tenant-based rental assistance, the following procedures will be followed for non-transferring household member(s), if the household separates in order to affect an emergency transfer
 - For households living in units that are otherwise assisted, the required policies must provide that for project participants who qualify for an emergency transfer, the household shall have priority over all other applicants for rental assistance, TH, and PSH projects funded through the CoC provided that the household meets all eligibility criteria required by Federal law or regulation or HUD NOFO; and the household meets any additional criteria or preferences established in accordance with Fair Housing 24 CFR 578.93(b)(1), (4), (6) or (7)42. The households shall not be required to meet any other eligibility criteria or preferences for the project. The household shall retain their original homeless or chronically homeless status for the purposes of the transfer.
- Please see Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking for information on: Emergency Transfer Request Documentation, Confidentiality, Emergency Transfer Timing and Availability, and Protocol for Transfer Request

Transfers between projects within the same project model

- When a current household must transfer to another Project within the same Project model (e.g., PSH to PSH, RRH to RRH), the provider should prioritize the household for resources operated by/available through their own organization.
- If the provider cannot transfer the household internally, they should email the Director of CE requesting the household be reviewed at the next CE case conferencing meeting. The provider will be expected to present information about why the household needs a transfer, including information about the efforts made by the current provider to meet the household’s needs and how the household will benefit from being served by a different provider. Attendees of the case conferencing will determine if the household will be prioritized.

Transfers from one project model to another (RRH to PSH)

- Project transfers may be made from RRH or TH to PSH so long as the household meets the eligibility criteria under the specific project and the requirements for the PSH project in the NOFO for the year the project was awarded.
- Please note: RRH providers are expected to gather all information necessary to determine if a household meets the chronic homeless definition (disability information and verification of homelessness, see Templates for CoC and ESG related programs Supplemental Resource) within 45 days of project enrollment. These documents should be uploaded to the global client documents within HMIS. Failure to do so will not allow for these households to receive the necessary additional priority for being chronically homeless for transfers.
- All transfers from one project model to another must begin with an email to the CE Director requesting the household be reviewed at the next CE case conferencing meeting. The provider will be expected to present information about why the household needs a transfer, including information about the efforts made by the current provider to meet the household’s needs and how the household will benefit from being served by a different provider.
- Attendees of the case conferencing will determine if the household will be prioritized. While TH to PSH transfers are eligible under the order of priority, TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. Therefore, TH residents will not be prioritized for PSH transfers unless

there are no other eligible chronically homeless households for the PSH project opening.

VIOLENCE AGAINST WOMEN ACT (VAWA)

Background: The Violence Against Women Act (VAWA), reauthorized in 2022⁴³, includes certain housing protections for victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking, who are applying for or residing in HUD funded housing programs, including ESG and CoC programs. VAWA provides housing protections to survivors, regardless of the victim’s sexual orientation, gender identity, sex, or marital status.

Changes to the McKinney-Vento Homeless Assistance Act Definition of Homelessness: For ESG and CoC Programs, VAWA 2022 amended Section 103(b) of the McKinney-Vento Homeless Assistance Act to require HUD to consider homeless any individual or family who:

- (1) is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
- (2) has no other safe residence; and
- (3) lacks the resources to obtain other safe permanent housing.

HUD VAWA Forms⁴⁴: Northeast FL CoC housing providers must provide all households applying for/ participating in ESG or CoC funded housing the following HUD VAWA Forms (which are available on the HUD website and linked below) at a minimum:

- (1) When a household is denied housing assistance from a program;
- (2) When a household is enrolled in/begins receiving housing assistance from a program;
- (3) When a household receives a notification of eviction; and

[HUD Home | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

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(4) When a household is notified their housing assistance is ending / being terminated.

- Form HUD-5380 Notice of Occupancy Rights under VAWA⁴⁶: informs households of their VAWA housing protections.
- Form 5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation⁴⁷: is 1 of 4 HUD approved ways of documenting a person’s status as a victim of a crime that VAWA protects. Housing providers must accept Form HUD-5382 / self-certification as sufficient documentation and may not ask for nor require additional documentation to prove a participant’s victim status.
- Form HUD-5383, Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking: may be used by participants to request an emergency transfer and certify that they meet the conditions for an emergency transfer under the Violence Against Women Act (“VAWA”).

[HUD Home | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](https://www.hud.gov/)

RECORD KEEPING STANDARDS FOR ALL PROJECTS

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

FINANCIAL RECORDKEEPING REQUIREMENTS

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

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

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

PARTICIPANT RECORDKEEPING REQUIREMENTS

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

GENERAL ELIGIBILITY All Projects must evaluate and document individuals’ and family’s eligibility per the HEARTH Homeless Definition Final Rule⁵¹. The specific Categories of homeless eligibility and required documentation are provided with each Project type.

GOAL PLANS/HOUSING STABILITY PLANS A record of services and assistance provided to each participant, including initial and updated goal plans- See sample Housing Plans (See Templates for CoC and ESG related programs Supplemental Resource). Projects should choose from among these examples or create a template that includes all the elements included in the housing stability plan templates.

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

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

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

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

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who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates entries are made.

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

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

[2011-30942.pdf](#)

INCOME DOCUMENTATION

(THIS APPLIES TO HP, ES, TH, TH-RRH, RRH AND PSH PROJECTS) Minimum standards for determination of an individual or family’s annual income consist of calculating income in compliance with 24 CFR 5.60952. Annual income is defined as all amounts, monetary or not, which:

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

Annual Income should be calculated considering:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation of a business (i.e., total revenue minus business operating expenses). This also includes any withdrawals of cash from the business or profession for your personal use.
- Monthly interest and dividend income credited to an applicant’s bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.

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- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.
- Income of Full-Time Students: The employment income of full-time students 18 years or older (excluding the head of household and spouse) in excess of \$480 is not counted in the annual income calculation.

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

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

- Once determined, the following indicate how income should be documented within HMIS: When a participant has income, but does not know the exact amount, a “Yes” response should be recorded for both the overall income question and the specific source, and the income amount should be estimated.
- Income received by or on behalf of a minor child should be recorded as part of household income under the Head of Household, unless the federal funder in the HMIS Project Specific Manual instructs otherwise. Income should be recorded at the client-level for heads of household and adult household members.
- Income data should be recorded only for sources of income that are current as of the information date (i.e., have not been specifically terminated). For example, if a participant’s employment has been terminated and the participant has not yet secured additional employment, the response for Earned income would be **NO**. If there is a change to expected project/participant contributions, reasons for such a change should be explained in case notes, and other documentation might be required to justify the change (proof of payment for unexpected expenditure, loss of job, etc.).

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

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

CASE MANAGEMENT STANDARDS FOR ALL PROJECTS

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

- Development of a Housing Plan (See Templates for CoC and ESG related programs Supplemental Resource) with households. Plans are highly participant driven without predetermined goals, and should build on each participant’s needs, goals, and strengths. The Housing Stability Plan should be reviewed monthly and revised, at a minimum, every 3 months. More frequent revisions will be needed during times of acute crisis.
- Creative problem solving to help households to self-resolve their housing crisis.
- Linkage to community-based services per the Housing Stability Plan.
- Promote access to and effective utilization of mainstream benefits:
 - Transportation assistance
 - Assistance with enrollment in income and non-income benefits
 - Follow-up at least annually to ensure benefits are received and renewed
 - Ensure access to SSI/SSDI technical assistance
- Engage participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement into permanent housing or maintenance of permanent housing. Projects should involve households in decisions about what they need to end their homelessness. This programming and planning should be respectful, incorporate strengths-based approaches and consumer choice.

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

PRINCIPLES OF CASE MANAGEMENT

- Person-Centered
 - Case Managers practice a person-centered approach that “ensures that the person who has experienced homelessness has a major say in identifying goals and service needs, and that there is shared accountability. The goal of case management is to empower people, draw on their strengths and capabilities, and promote an improved quality of life by facilitating timely access to the necessary supports, thus reducing the risk of homelessness and/or enhancing

- housing stability.” Services should be participant directed, highly individualized and tailored to participant’s needs, respectful of individuals’ rights to self-determination, and voluntary. Case Managers should be trained in person-centered case management strategies including Trauma-Informed Care, Motivational Interviewing, Critical Time Intervention and Harm Reduction, among others.
- Housing-Focused
 - Projects should focus on the goal of assisting participants to secure and maintain permanent, stable, affordable housing. For participants not currently in safe, decent, affordable housing, the primary goal is to develop a strategy to assist them in securing housing. For those already housed, the goal is to assure that adequate supportive services are in place so the participant/household can maintain housing.
 - Trauma-informed care
 - Trauma-informed care is an organizational structure and framework that involves understanding, recognizing, and responding to the effects of all types of trauma. It emphasizes physical, psychological and emotional safety for both participants and providers, and helps participants rebuild a sense of control and empowerment. Trauma-informed care operates with the following principles:
 - ❖ Consumer empowerment: Using individuals’ strengths to empower them in the development of their goals
 - ❖ Choice: Informing consumers regarding Project and housing options so they can choose the options they prefer;
 - ❖ Collaboration: Maximizing collaboration among staff, participants and their families in organizational and individual goal planning;
 - ❖ Safety: Developing healthy home settings and activities that ensure consumers’ physical and emotional safety; and
 - ❖ Trustworthiness: Creating clear expectations with consumers about what proposed Projects entail, who will provide services, and how supports will be provided.
 - Progressive Engagement
 - Progressive Engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without assistance.
 - Progressive engagement recognizes that there is no way to accurately predict how much help someone may need to end their homelessness and avoid a return to the streets or shelter. While we know that many people can

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

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

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negatively impact housing stability. As such, the intensity of Case Management frequency, duration, and support can and will change over time.

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

LOCATION/TIMING

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

DURATION

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

STANDARDS BY PROJECT TYPE

PERMANENT SUPPORTIVE HOUSING (PSH)

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

Access

Referrals to PSH must come through CE.

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

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence 54 Regular case management meetings may not be possible where prohibited by Violence Against Women Act

AND

- At least one member of the household must have a disability

Regarding Project Transfers into PSH: In accordance with CE policy/procedure for transitioning households from RRH to PSH, households in RRH who are both eligible for PSH and in need of non-time limited supportive housing will be eligible to transfer from RRH to PSH. See “Transfers” section.

Prioritization Households must be prioritized through CE in accordance with HUD’s most current Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in PSH⁵⁵ (CPD-16-11 is the operational Notice at the time of the development of this Plan) and with the CoC’s Order of Prioritization.

All CoC and ESG funded projects are required to prioritize households with the longest history of homelessness and with the most severe service needs for all available CoC resources through regional CE case conferencing.

The determination of severe service needs will be based on the Housing and Service Needs Assessment Score, CE Assessment Tool, and information presented during monthly case conferencing.

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

Order of Prioritization for PSH Providers:

Each County CES prioritized by-name list will be prioritized in the following way:

Priority Bracket	Criteria	Tie - Breaker
1 ST Priority	Special Population designated by the CoC	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
2 ^{NS} Priority	People experiencing chronic homelessness	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
3 RD Priority	All eligible households not included under 1 st Priority or 2 nd Priority	HN/SN Score, LOT Homeless, then CE Assessment Tool Score

Priority Bracket Criteria Tie-Breaker

For households transferring into PSH from other housing projects, if the household was chronically homeless at entry into their current project, the household will be prioritized in the Second Priority Bracket. Within each priority bracket, it will be determined via case conferencing where a transferring household will be prioritized compared to currently homeless households.

*The CoC is committed to participant choice. Therefore, in applying the order of priority, households shall be considered for all counties they have expressed interest in via the CE assessment, and all counties in the region where they are currently experiencing homelessness.

While TH to PSH transfers is eligible under the order of priority, TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. Therefore, TH residents will not be prioritized for PSH transfers unless there are no other eligible chronically homeless households for the PSH project opening.

As of fall 2024 the CoC is using the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the quantitative CE assessment tool. However, this is subject to change.

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

If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Northeast Florida CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See FL- 510 Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual A

Documentation

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

- Each potential Project participant must have Documentation of Disability see Templates for CoC and ESG related programs Supplemental Resource.
- Each potential Project participant must have Documentation of Chronic Homelessness Status - See Templates for CoC and ESG related programs Supplemental Resource. CoC-funded PSH projects must also follow the recordkeeping recommendations of HUD CPD Notice 16-11 regarding: Evidence of Severe Service Needs; Evidence that the Recipient is Following the CoC’s Written Standards for Prioritizing Assistance; and Evidence that there are no Households Meeting Higher Order of Priority within CoC’s Geographic Area.
- PSH projects should follow the detailed guidance on recordkeeping related to documenting chronic homelessness can be found in the HUD CoC Virtual Binder .
- In most cases, PSH providers should obtain documentation of disability and chronic status prior to enrollment. However, please note that in some cases CoC-funded PSH projects may enroll a household without documentation if, based on the household’s intake screening, the project believes the household to be eligible but lacks the necessary paperwork at enrollment; AND the project can obtain the necessary documentation within 45 days of project enrollment. PSH providers should ensure that eligibility documentation is completed prior to moving in. CoC-

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funded PSH projects should follow their CE Policies and Procedures related to documentation needed prior to enrollment.

If self-certification of chronic homelessness is received, HUD recommends that the recipient continue to obtain third-party documentation within 180 days of the participant’s enrollment in the project. However, breaks in homelessness can be documented by self-certification.

- If self-certification of chronic homelessness is received, HUD recommends that the recipient continue to try to obtain third-party documentation within 180 days of the participant’s enrollment in the project. However, breaks in homelessness can be documented by self-certification.
- An executed occupancy agreement or lease (see sample occupancy/lease in Templates for CoC and ESG related programs Supplemental Resource) must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease or occupancy agreement start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
 - Signatures of both parties.
 - HUD-91067 VAWA Lease Addendum

Duration and Amounts

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

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

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

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

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

Minimum Standards

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

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

Case Management

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

- Support services must be made available to Project participants, but they may not be required for continued Project eligibility.
- Case managers should offer monthly case management meetings, with more offered as needed (especially in the first year). Household case management needs may decrease over time. While participation in services is voluntary, case managers should offer services to all participants and work to engage participants, even if services have been declined in the past.
- For projects with operating or leasing dollars where occupancy agreements or sub-leases are used, the role of the case manager and the role of landlord/ property manager should be separate and distinct to ensure the case manager can engage with the participant to build trust and rapport instead of focusing on holding the participant accountable to their lease.
- For PSH projects with rental assistance dollars
- Provide housing locator services. While the amount of assistance related to housing search varies by provider, at a minimum this should include:
 - Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
 - Provide education and outreach to landlords to address potential barriers to their participation
 - Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
 - Help individuals and families negotiate manageable and appropriate lease agreements with landlords
 - In general, some households may need more intensive assistance with housing search than others, due to barriers to tenancy (such as criminal record) or lack of experience with rental housing in the past. PSH providers with rental assistance dollars should be prepared to provide more assistance to households who may need a higher level of support to identify an eligible unit. This may include:
 - Assisting the household to look up eligible units online or via other local resources.
 - Assisting the household in calling landlords to inquire about available units.

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

Strategies to Support Stable Transitions from PSH

- Shared Housing arrangements are allowable in PSH, and providers are encouraged to explore and support these arrangements if this would support the long-term housing stability of project participants⁶¹. Shared Housing arrangements may be particularly helpful in areas with high costs of living where renting an SRO or 1BR apartment may not be financially viable long term for individual participants.

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- Shared housing is broadly defined as a living situation where two or more individual or family units share a single housing unit. This includes sharing housing costs like rent and utilities. Each individual or family unit has their own personal space, but there are common spaces that are shared such as bathrooms, kitchen and living room. Housing units can be any unit with multiple bedrooms. It can be an apartment or an entire building. The homeowner can live on the premises or not, but if the homeowner is related to the tenants, CoC and ESG dollars cannot pay rent.
- A one-bedroom unit cannot be used for shared housing. Shared housing is not the same as doubled up. Each individual or family unit has their own space and resides in housing that is permanent.
- In a shared housing arrangement, each individual or family unit must hold their own lease.
- 4 keys to implementing successful shared housing:
 - 1) Identifying households who may be interested in shared housing;
 - 2) Developing a process that matches appropriate people together, driven by client choice;
 - 3) Engaging landlords who are amenable to split lease scenarios and streamlining the process as much as possible for landlords. Note that PSH projects with leasing dollars can begin facilitating shared housing arrangements immediately, via sub-lease agreements;
 - 4) Clarifying expectations about how the shared housing arrangement will work. Shared housing agreements can help clarify expectations. These agreements can cover anything from house rules, visitor expectations, sharing of bills (food, utilities, etc.), and more.
- Projects should follow HUD guidance on calculating rent contributions in shared housing.

Performance Measures

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

- At least 80% of households in PSH retain their housing or exit to permanent housing.
- No more than 6% of households that exit to permanent housing after being homeless should become homeless again within 12 months.
- At least 35% of adults served by PSH Projects will increase their income through either employment or benefits; 20% will increase earned income and 25% will increase non-employment income.

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- At least 60% of households served under a PSH Project will be linked to mainstream resources. (2024 CoC Renewal Scoring)

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RAPID REHOUSING (RRH)

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

Access

All referrals to RRH must come through Coordinate Entry (CE).

Eligibility

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

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

AND

- Must be unable to access housing without assistance

*Currently under ESG, Category 4 households must also meet the requirements of Category 1; and for CoC-funded RRH funded prior to 2015, households must also meet the requirements of Category 1. An individual or family that qualifies as homeless under Category 4 but does not meet Category 1 as well would not be eligible for ESG RRH assistance but may be eligible for ESG HP assistance. (24 CFR 576.10464)

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

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

Prioritization

All CoC- and ESG-funded projects are required to prioritize households with the longest history of homelessness and with the most severe service needs for all available CoC resources through regional CE case conferencing. The determination of severe service needs will be based on the Housing and Service Needs Assessment Score, CE Assessment Tool Score, and information presented during monthly case conferencing.

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Order of Prioritization for RRH Projects:

Priority Bracket	Criteria	Tie - Breaker
1 ST Priority	Special Population designated by the CoC	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
2 ^{NS} Priority	People experiencing chronic homelessness	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
3 RD Priority	All eligible households not included under 1 st Priority or 2 nd Priority	HN/SN Score, LOT Homeless, then CE Assessment Tool Score

For households transferring into RRH from other housing projects, if the household was chronically homeless at entry into their current project, the household will be prioritized in the Second Priority Bracket. Within each priority bracket, it will be determined via case conferencing where a transferring household will be prioritized compared to currently homeless households.

*The CoC is committed to participant choice. Therefore, in applying the order of priority, households shall be considered for all counties they have expressed interest in via the CE assessment, and all counties in the region where they are currently experiencing homelessness.

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

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

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Documentation

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

- For ESG-funded RRH, the Documentation of Homelessness (See Templates for CoC and ESG related programs Supplemental Resource) must be completed to enrollment of a household into a RRH Project.
- For ESG-funded RRH, an executed Landlord-agency Agreement (See Templates for CoC and ESG related programs Supplemental Resource) must be on file. Projects must offer a standard, basic level of support to all landlords who lease to project participants as detailed in a written agreement that should be signed by the Case Manager or Housing Locator and the landlord. At a minimum, this agreement should specify that the Case Manager and/or Housing Locator will:
 - Inform the landlord about the amount and duration of financial assistance being provided to the participant;
 - Respond quickly (ideally within one business day) to landlord calls about serious tenancy problems;
 - Seeking to resolve conflicts around lease requirements, complaints by other tenants, and timely rent payments; and,
 - If necessary, help negotiate move-out terms and assist the participant to quickly locate and move into another unit without an eviction.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The Lease (see sample in Templates for CoC and ESG related programs Supplemental Resource) must include:
 - Renter's name and property address;
 - Landlord's name and address;
 - Lease start and end dates;
 - Monthly rent amount (including the prorated amount for the first month if a partial month);
 - Security deposit amount (if any);
 - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
 - Signatures of both parties.
 - HUD-91067 VAWA Lease Addendum

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Other documents required in all case files:

- Passed Inspection (Minimum Habitability Standards and Lead-Based Paint for ESG funded RRH and Housing Quality Standards for CoC-funded RRH). The passed inspection must be dated BEFORE the lease and, for ESG, before the landlord agency agreement is dated and executed.
- **Housing Plans** (see Templates for CoC and ESG related programs Supplemental Resource) are required. RRH Case Managers should work with project participants to develop a written strengths-based, consumer driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family reunification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participants and kept in their file.

Duration and Amounts

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

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

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

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extending RRH assistance past 12 months. Reasonable extension justifications could include:

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

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

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

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

- First month’s rent can be offered in full to assist the household. In the event the first month is prorated, the first full month may also be paid in full, if commensurate with the household’s need, and security deposits cannot exceed 2 months of actual rent.
- If, under the terms of the lease, the participant is responsible for paying their own utilities, grantees must follow the requirements for utility payments and reimbursement per Notice: CPD-17-1167:
 - CoC interim rule explicitly requires RRH projects to calculate rent as the sum of the total monthly rent for the unit and, if the participant pays separately for utilities, the monthly allowance for utilities established by the public housing authority (PHA) for the area in which the housing is located.
 - For the purposes of determining the reasonable monthly utility consumption, Projects must use the local PHA’s schedule of utility allowances, which are based on unit size and the utilities the project participant is expected to pay. Grantees should contact their PHA to obtain the schedule of utility allowances and exception utility allowances.
- For ESG-funded projects, unit rent must NOT exceed Fair Market Rent (FMR) AND it must not exceed Rent Reasonableness. For CoC-funded Projects, unit rent may exceed FMR, but it may not exceed Rent Reasonableness. This means that a

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recipient or subrecipient is allowed to pay rents up to the rent reasonable amount even if this is higher than the FMR. If rent reasonableness rates are lower than FMR, the maximum allowable contract rent amount is still capped at rent reasonableness rates.

- Additional costs may be covered to assist households enrolled in RRH, but projects should refer to their actual grant application and NOFO/Project guidelines applicable to the contract year(s) they are funded for.
- In some cases (approved by CoC Governing Board and/or CoC Funding Committee), CoC RRH funds can be used for Rapid Exits. Through **Rapid Exits**, RRH funds can be used from day 1 of a household’s contact with Coordinated Entry during the Diversion and Rapid Exit Phases of CE for one-time financial assistance (such as first/last/security deposit/utility deposit) and light-touch case management focused on housing search and ensuring a household is connected to the mainstream benefits and resources they qualify for (Medicare, Medicaid, SSI, Food Stamps/ SNAP, local Workforce office, early childhood education, TANF, substance use disorder programs, employment assistance programs).
 - Rapid Exit funds are prioritized for households with a source of income who need minimal financial assistance to exit homelessness, and who have identified a unit or are in the process of identifying a unit, and do not require ongoing supportive services/ case management. Rapid Exit funds may be used to assist households with housing search.

Households identified for Rapid Exits are not required to go through the full CE prioritization, case conferencing, and referral process.

Minimum Standards

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

- Households should be enrolled into rapid re-housing once it is mutually agreed upon (by the participant and the provider) that the two parties will be working toward permanent housing together. Providers should not wait until permanent housing is found to enroll the household.
- Exit planning should start upon Project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy or with a permanent subsidy resource such as Public Housing, Housing Choice Vouchers, affordable housing developments, etc. (Housing Plan Template- See Templates for CoC and ESG related programs Supplemental Resource)

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- Income is reassessed at least quarterly for the purpose of adjusting rental payments. Although these income assessments should be accounted for in HMIS, they generally will not have a bearing on eligibility (apart from the Annual Assessment, at which time the household must fall within eligible income limits to be minimally eligible for continued RRH assistance). Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Conversely, if the household has not reached stabilization yet, they may still obtain RRH assistance, regardless of their actual income at non-Annual, quarterly Assessments. Some indicators of stability could be:
 - Goals cited in previously created goal plans will be realized
 - The household will be paying rent in full (or to the level agreed upon as described above)
 - The housing crisis is resolved
 - The household feels as though they have enough supports in place to maintain stabilization without ESG’s essential services
- Provide housing locator services. While the amount of assistance related to housing search varies by provider, at a minimum this should include:
 - Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
 - Provide education and outreach to landlords to address potential barriers to their participation
 - Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
 - Help individuals and families negotiate manageable and appropriate lease agreements with landlords
 - In general, some households may need more intensive assistance with housing search than others, due to barriers to tenancy (such as criminal record) or lack of experience with rental housing in the past. RRH providers should be prepared to provide more assistance to households who may need a higher level of support to identify an eligible unit.

This may include:

- Assisting the household to look up eligible units online or via other local resources.
- Assisting the household in calling landlords to inquire about available units.
- Accompanying the household to view unit and meet with landlords.
- Assisting the household in reviewing and understanding lease terms.

Case Management

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

- Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy.
- Case management meetings are required monthly, although additional meetings can always be offered by the case manager as needed and/or scheduled as requested by the participant. Meetings should be in the participant’s home or in a mutually agreed-upon community setting, as opposed to an office setting, to the greatest extent possible.
- Shared Housing arrangements are allowable in RRH, and providers are encouraged to explore and support these arrangements if this would support the long-term housing stability of project participants⁶⁸. Shared Housing arrangements may be particularly helpful in areas with high cost of living where renting an SRO or 1BR apartment may not be financially viable long term for individual participants.
 - Shared housing is broadly defined as a living situation where two or more individual or family units share a single housing unit. This includes sharing housing costs like rent and utilities. Each individual or family unit has their own personal space, but there are common spaces that are shared such as bathrooms, kitchen and living room. Housing units can be any unit with multiple bedrooms. It can be an apartment or an entire building. The homeowner can live on the premises or not, but if the homeowner is related to the tenants, CoC and ESG dollars cannot pay rent.
 - A one-bedroom unit cannot be used for shared housing. Shared housing is not the same as doubled up. Each individual or family unit has their own space, holds their own lease and resides in housing that is permanent.
 - In a shared housing arrangement, each individual or family unit must hold their own lease.
 - 4 keys to implementing a successful shared housing model:
 - 1) Identifying households who may be interested in shared housing;
 - 2) Developing a process that matches appropriate people together, driven by client choice;

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

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

Performance Measures

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

- 80% or more of participants will exit to permanent housing
- 35% or more of adult participants will increase income from sources other than employment
- 40% or more of adult participants have employment income
- 40% or more of adult participants increase employment income
- 50% or more of all participants have mainstream (non-cash) benefits at exit from program

TRANSITIONAL HOUSING (TH)

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

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

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

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

Eligibility

- The following categories of individuals or families are eligible for HUD-funded TH services:
- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence

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AND

- Households must either present with multiple barriers to obtaining and retaining housing or have one primary barrier other than financial (people whose primary barrier to housing stability is economic in nature do not require TH).

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

Non-HUD funded TH Projects may serve Categories 1, 2, 3 and 471, or per their established eligibility requirements.

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

Prioritization

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

All CoC and ESG funded projects are required to prioritize households with the longest history of homelessness and with the most severe service needs for all available CoC resources through regional CE case conferencing. The determination of severe service needs will be based on the Housing and Service Needs Assessment Score, CE Assessment Tool score, and information presented during regular case conferencing.

Order of Prioritization for RRH Projects:

Priority Bracket	Criteria	Tie - Breaker
1 ST Priority	Special Population designated by the CoC	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
2 ^{NS} Priority	People experiencing chronic homelessness	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
3 RD Priority	All eligible households not included under 1 st Priority or 2 nd Priority	HN/SN Score, LOT Homeless, then CE Assessment Tool Score

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Because TH may serve as crisis housing, if there are no chronically homeless households prioritized for a project, the project may, through CE case conferencing, prioritize households facing emergency situations, such as high lethality DV situations.

For households transferring into TH from other housing projects, if the household was chronically homeless at entry into their current project, the household will be prioritized in the Second Priority Bracket. Within each priority bracket, it will be determined via case conferencing where a transferring household will be prioritized compared to currently homeless households.

*The CoC is committed to participant choice. Therefore, in applying the order of priority, households shall be considered for all counties they have expressed interest in via the CE assessment, and all counties in the region where they are currently experiencing homelessness.

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

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking: If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the FL-510 CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days.

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Documentation

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

- Executed Occupancy Agreement and any extensions, if applicable

Duration and Amounts

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

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

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

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

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

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Minimum Standards

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

Case Management

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

Additional case management standards for this project type include:

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

Performance Measures

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

- 80% or more of all participants will exit to a permanent housing situation
- 54% or more of adult participants will have income from sources other than employment
- 56% or more of all participants have mainstream (non-cash) benefits at exit from program
- 20% or more of adult participants have employment income
- 20% or more of participants will increase employment income
- 54% or more of adult participants will increase income from all sources

JOINT TRANSITIONAL HOUSING/RAPID REHOUSING (TH-RRH)

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

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

Access

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

Eligibility

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

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

Prioritization

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

All CoC-funded projects are required to prioritize households with the longest history of homelessness and with the most severe service needs for all available CoC resources through regional CE case conferencing. The determination of severe service needs will be based on the Housing and Service Needs Assessment Score, VISPDAT Score, and information presented during regional case conferencing.

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

Documentation

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

Duration and Amounts

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

Minimum Standards

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

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

HMIS/reporting requirements:

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

Case Management

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

Additional case management standards for this project type include:

- For projects with operating or leasing dollars where occupancy agreements or subleases are used, the role of the case manager and the role of landlord should be separate and distinct to ensure the case manager can engage with the participant to build trust and rapport instead of focusing on holding the participant accountable to their lease.

HOMELESS PREVENTION (HP)

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

Access

Households will be screened for prevention resources through CE. If a household is identified at risk of homelessness (per HMIS assessment), CE assessor will refer to prevention providers in their county. These households will NOT be added to the Prioritization List/BNL. There may be more than one prevention provider in the county (e.g., ESG; PHFA; SSVF HP, etc.). The CE assessor should refer the participant to all prevention resources for which they are eligible. The CE assessor should make every attempt to make a "warm handoff" directly to a prevention provider agency. *Note: CE assessor may be the prevention provider for the county. If so, they can make referral within their own agency. Upon receipt of referral, prevention providers will screen participants for eligibility. If a prevention provider receives ESG funds they will use the **ESG HP Screening Workflow in HMIS** to prioritize households for HP assistance, as directed by DCED/the CoC. Prevention providers who receive other funding sources are also encouraged to use the Prevention Screening tool.

An **ESG HP (Emergency Solutions Grant – Homelessness Prevention)** screening workflow in **HMIS (Homeless Management Information System)** ensures that households are appropriately assessed for eligibility and need before being enrolled in ESG Homelessness Prevention assistance. Here's a standard ESG HP screening workflow in HMIS:

ESG Homelessness Prevention (HP) Screening Workflow in HMIS

1. Initial Contact / Referral

- **Client contacts agency** or is **referred** from Coordinated Entry, 2-1-1, shelter diversion, etc.
- Document **Date of Contact** and **Referral Source** in HMIS.

2. Eligibility Pre-Screen

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- Conduct a **brief pre-screen** to determine potential eligibility for HP services:
 - Does the client currently **reside in housing** (not literally homeless)?
 - Is the client at **imminent risk of homelessness** (e.g., eviction notice)?
 - **Household income** below 30% AMI?
 - **No other housing options** or support networks available?
-

3. Full ESG HP Assessment

If eligible through pre-screen, proceed with full ESG HP assessment in HMIS:

- **Housing Status**
 - Category 2: Imminent risk of homelessness (within 14 days)
 - Category 3 or 4: Other HUD-defined risk situations if ESG-funded jurisdiction allows
 - **Income & Benefits**
 - Enter income sources and amounts in HMIS
 - Total income must be at or below 30% AMI
 - **Barriers & Risk Factors**
 - History of housing instability
 - Domestic violence or safety concerns
 - Health issues or other vulnerabilities
 - **Current Housing Situation**
 - Type of housing, rent amount, lease status
 - Risk of losing housing (e.g., eviction notice, utility shutoffs)
-

4. Documentation Collection

- **Verification of housing status** (eviction notice, landlord letter, etc.)
 - **Proof of income** (pay stubs, benefits award letters)
 - **Identification documents** (as required)
 - Upload scanned documentation into HMIS (if system allows)
-

5. Eligibility Determination

- Based on HUD ESG guidelines:
 - Must meet HP criteria (Category 2 or 4, with <30% AMI)
 - Must lack sufficient resources/support to stay housed
- Determine if the household is **eligible** or needs **referral to another program** (e.g., Rapid Re-Housing)

6. Enrollment in ESG HP Project (if eligible)

- In HMIS, create a **project enrollment** for ESG HP
 - Complete all **Entry Assessment fields**, including:
 - Project start date
 - Household members
 - Disabilities, health, and services needed
-

7. Service Planning & Case Management

- Develop a **Housing Stability Plan**
 - Document services provided:
 - Mediation, legal services, rental assistance, budgeting help, etc.
 - Update **case notes** and **services in HMIS**
-

8. Financial Assistance (if applicable)

- Document financial services:
 - Rent arrears, future rent, utilities, moving costs
 - Track disbursements and upload supporting documents
-

9. Monitoring & Follow-Up

- Conduct **monthly check-ins** or as required
 - Assess ongoing need for support
 - Update assessments in HMIS if housing situation changes
-

10. Exit from Program

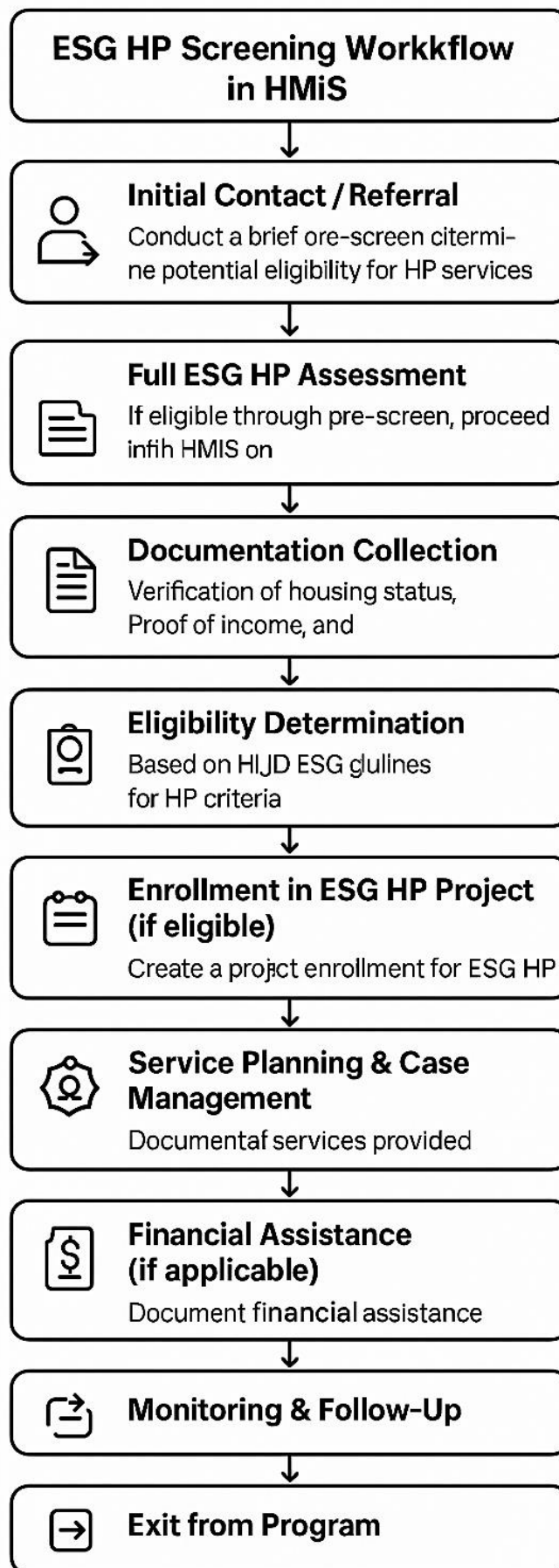
- Exit household from ESG HP project when:
 - Housing is stabilized OR
 - Household becomes ineligible or moves to another program
- Complete **Exit Assessment**:
 - Housing destination
 - Income at exit
 - Non-cash benefits

- Services received
-

11. Data Quality & Compliance

- Regularly review:
 - Data completeness
 - Timeliness of entries
 - HMIS Data Standards compliance
- Prepare for **audits and reporting** (e.g., CAPER, SAGE uploads)

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



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Eligibility

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

- Category 2: Imminent Risk of Homeless; or
- Category 4: Fleeing/Attempting to Flee Domestic Violence*; or
- At-risk of homelessness as defined at 24 CFR 576.273; AND
- Households must be very-low income: gross annual income must be less than 30% of area median income based on the income limits recently published by HUD74 .

Some households who apply for ESG HP assistance may be losing their housing, but they have another safe and appropriate housing option – including temporary options – where they can stay while they work to obtain their own housing. An applicant may also have another resource they can use to maintain current housing or obtain new housing. Such applicants would not be considered at imminent risk of literal homelessness.

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

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

Prioritization

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

Order of Prioritization for HP Projects:

1. Category 2 - Homeless with a court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance
2. Category 2, 3, or 4 Homeless
3. At-risk of homelessness as defined at 24 CFR 576.275

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HP Providers should identify households, through both CE and direct referrals. ESG HP providers should prioritize households by utilizing the ESG HP Screening Workflow in HMIS.

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking: If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the FL-510 CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days.

Documentation

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

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

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- Lease start and end dates;
- Monthly rent amount (including the prorated amount for the first month if a partial month);
- Security deposit amount (if any);
- Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
- Signatures of both parties
 - HUD-91067 VAWA Lease Addendum
- Other documents required in all case files:
 - Passed Inspections (Minimum Habitability Standards and Lead-Based Paint)-
Note: for ESG-funded HP, the passed inspection must be dated BEFORE the lease and landlord-agency agreement are dated and executed. For rental arrears, the date of the lease needs to be before the inspection.
 - Housing Plans (See Templates for CoC and ESG related programs Supplemental Resource) are required. HP Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.
- If rental arrearages are being paid, there must be proof of funds owed and that the landlord will cease eviction proceedings if paid.
- If utility arrearages are being paid, there must be proof of the shut-off, that the household is responsible for utilities per the lease, and that the bill is in the participant’s name at the address on the lease.

Duration and Amounts

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

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

The amount of rental assistance provided is highly individualized, but should generally titrate down (i.e., lessen) the level of HP subsidies over time so that each household

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contributes more as they are able to and as stabilization is realized. Participants may receive approval for the minimum amount of rental assistance necessary to stabilize their housing crisis.

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

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

Reasonable extension justifications include serving:

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

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

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

- Rental or utility arrearages of up to 4 months may be paid if doing so will stop an eviction and prevent homelessness. The total arrearages may be more, in which

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case, additional funds can be used, or the landlord may opt to forgive that debt or create a repayment plan with the household.

- First month’s rent after enrollment can be offered in full to assist the household. In the event the first month is prorated, the first full month may also be paid in full, if commensurate with the household’s need, and, in the event the household relocated, security deposits cannot exceed 2 months of actual rent.
- Unit rent may not exceed either FMR or Rent Reasonableness.
- Additional costs may be covered to assist households enrolled in HP, but projects should refer to their actual grant application guidelines applicable to the contract year(s) they are funded for.

Minimum Standards

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

- Income is reassessed quarterly for the purposes of eligibility and adjusting rental payments. Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Some indicators of stability could be:
 - Goals cited in previously created goal plans will be realized.
 - The household will be paying rent in full (or to the level agreed upon as described above)
 - The housing crisis is resolved
 - The household feels as though they have enough support in place to maintain stabilization without ESG’s essential services.

Case Management

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

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

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Performance Measures

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

-
- A reduction in the number of homeless individuals and families seeking emergency shelter services. b. Expected Outcome.
 - At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance.
-

EMERGENCY SHELTER (ES)

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

Access

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

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

Victims of Domestic Violence, dating violence, sexual assault, and stalking: To the extent possible, these households will be referred to the local domestic violence agency for safe shelter.

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When not feasible, shelter providers will work with their local domestic violence agency to develop protocols to meet their safety needs.

Eligibility

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

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

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

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

Prioritization

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

Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking: If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the North Florida 510 CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days.

Documentation

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

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

Duration and Amounts

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

Minimum Standards

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

- Engaging participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement back into permanent housing.
- Discharging, to the greatest extent possible, to a permanent housing resource.
- Operating in compliance with The Final Rule for Equal Access in HUD Projects.
 - Family shelters must serve all family compositions.
- Making it known that use of the facilities and services are available to all on a nondiscriminatory basis.
- ES that serves families with children are prohibited from denying assistance to or separating members of a family with children based on gender or age.
- To the extent possible, ES should have 24/7 hours of operation.
- ES should operate with a low-barrier approach, to the maximum extent possible. This includes:
 - People do not have to line up for a bed each night or leave early in the morning
 - No drug and alcohol testing to get in
 - Not requiring identification documents to get in (and assist participants once they are in shelter to obtain these documents)

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- No criminal background checks to get in
- Not requiring income to get in
- Not requiring “housing-readiness” to get in
- Accepting all family configurations if shelter provides services to families
- Accepting couples, if shelter provides services to singles
- Not requiring participation in services to remain in the shelter. Shelters should offer and encourage participation in services; however, shelters should not mandate services as a requisite for remaining in the shelter.

There must be access to staff, whether paid or volunteer during hours of project operation. This may be on site or through cell phone, if necessary.

- Shelters should provide access to food preparation and food storage space.
- Shelters should make an effort to establish secure space for storage of personal possessions.
- To the maximum extent possible, shelters should provide secure storage of medications, especially in shelters with children.
- Smoking is prohibited in buildings that provide shelter to children.
- Weapons may not be brought into ES.
- Shelter guests may not bring or use illegal substances or alcohol on the premises

Case Management

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

- Exit planning should start with project entry with regular discussions about moving towards permanent housing.
- Shelter staff should conduct an initial service assessment within 7 days of intake, prioritizing emergency service needs and referral to CE; the access, assessment, and diversion phases of CE; then coordinating/providing services most crucial to housing

Performance Measures

The CoC has established the following performance goals for ES:

- Households should move into permanent housing within an average of 35 days. (CoC System Performance Measures)
- At least 44% of households who exit ES exit to permanent housing. (CoC System Performance Measures)
- No more than 6% of households that exit to permanent housing after being homeless should become homeless again within 12 months

STREET OUTREACH (SO)

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

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

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

Eligibility

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

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

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

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

Prioritization

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Anyone who is unsheltered is prioritized for SO, although everyone who meets eligibility should be able to be enrolled. Documentation Relevant documentation standards include the information presented in the “Documentation for All Project Types” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

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

Duration and Amounts

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

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

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

Minimum Standards

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

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

Case Management

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

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

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

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

Performance Measures

The CoC has established the following performance goals for SO:

- At least 84% of households served under a SO Project will exit to housing of their choice (CoC System Performance Measures).

SUPPORTIVE SERVICES ONLY (SSO)

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

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

Access

Staff are able to enroll households outside the office walls, engaging with participants early and often. SSO projects are required to provide the access, diversion, assessment, prioritization, and referral phases of CE, as described in the CE Policies and Procedures. SSO projects that are funded to provide Prevention services, including assessment, triage, and/or HPS Prevention services, must provide the Prevention phase of CE. SSO projects that are funded to provide longer-term case management must provide the Rapid Exit phase of CE. If SSO projects are funded to provide the Prevention and Rapid Exit phases of CE, they must use a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance,

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including onetime payments and short-term housing assistance, to identify the lightest-touch method to successfully re-establish each household into safe, stable permanent housing.

Eligibility

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

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

Prioritization

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

Documentation

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

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

Duration and Amounts

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

Minimum Standards

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

Case Management

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

- Supportive services must focus on assisting participants in obtaining housing and engage participants from day one to assess housing barriers, develop housing plans, and link

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households to the right types of assistance to facilitate movement back into permanent housing.

- Services should include linking participants to mainstream benefits and resources, including behavioral health and intellectual disability services.
- Case management services should be targeted to assisting households with attaining housing stability as quickly as possible.
- Participants should be linked to additional services by way of a warm hand off to the greatest extent possible.

COORDINATED ENTRY (SSO-CE)

SSO-CE projects, which include CE Assessment Centers and CE staff, shall be governed by (1) the established expectations and standards outlined in the MOU between the CoC Governing Board and the SSO-CE grantee/ CE Lead Agency, (2) the CoC’s Coordinated Entry Policies and Procedures, and (3) other applicable CE governing documents as they are adopted.

1. Urban Rest Stop: (Should not be used as an emergency shelter)

- a. Engagement activities
- b. Address/provide basic survival items (blankets, gloves, socks, personal care items, etc.)
- c. Provide assistance with navigating system/link to services
- d. Assist with obtaining housing
- e. Transportation
- f. Provide a low demand environment
- g. Provision of basic needs (laundry, shower, snacks, clothing, etc.)
- h. Provide social supports (informal counseling by staff, peers, etc.)
- i. Co-location of other service providers
- j. Can be used as jail diversion for small offenses (sleeping in public place, trespassing, etc.)
- k. Minimum Safety Measures
 - i. A minimum of two staff must be present while open
 - ii. Must have a working phone available
 - iii. Participants must sign in/out

Performance Measures

- 80% or more of all participants who are determined eligible will exit to a permanent housing situation
- 54% or more of adult participants will have income from sources other than employment
- 56% or more of all participants have mainstream (non-cash) benefits at exit from program
- 20% or more of adult participants have employment income
- 20% or more of participants will increase employment income
- 54% or more of adult participants will increase income from all sources

Appendices

HUD’s Requirements for Written Standards

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

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

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

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

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

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

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

Applicable to ALL ESG program types:

- (i) Standard policies and procedures for evaluation of individuals’ and families’ eligibility under ESG
- (v) Coordination with the below referenced programs and resources is required of all ESG funded programs:
 - Coordination with other targeted homeless services: Per 24CFR576.400(b) ESG funded programs are required to coordinate with other programs targeted at people experiencing

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homelessness in the area covered by the CoC to provide a strategic, community-wide system to prevent and end homelessness for the CoC. A list of these programs is provided in Appendix A.

- System and program coordination with mainstream resources: Per 24 CFR 576.400(c) ESG funded programs are required to coordinate to the maximum extent practicable, ESG funded activities with mainstream housing, health, social services, employment, education, and youth programs for households experiencing homelessness or at risk of homelessness. Examples of these programs are provided in Appendix A on the HUD website.

Applicable to HOMELESSNESS PREVENTION AND RAPID REHOUSING:

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

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

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

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

Applicable to EMERGENCY SHELTERS:

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

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

Applicable to STREET OUTREACH:

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

CoC Monitoring Tools

CoC Monitoring Tools CoC-funded projects can use the CoC’s Desk Monitoring Tools (self-monitoring tools) to monitor compliance with HUD requirements, including:

- Organizational Level Requirements
- Project Level Requirements
- Fiscal Requirements – Org Level
- Fiscal requirements – Project Level
- Client File Checklist

Desk Monitoring Tools can be found here:

[Desk Monitoring Tools - CoC - Dropbox](#)

Violence Against Women Act of 2022 Requirements for Housing Providers

The Violence Against Women Act, reauthorized in 2022, includes protections for survivors who are applying for or residing in covered housing programs, which includes ESG and CoC Program funded programs, to help keep them safe and reduce their likelihood of experiencing homelessness.

HUD has created the following forms to support housing providers comply with the requirements of VAWA. These forms are currently undergoing revision and renewal:

- [Form HUD-5380, Notice of Occupancy Rights under VAWA](#)
- [Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking, and Alternate Documentation](#)
- [Form HUD-5383, Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking](#)
- HUD-91067 VAWA Lease Addendum