



Bucks County Continuum of Care Written Standards

Latest Revision: July 1st, 2024

Adopted by CoC Executive Committee: July 2nd, 2024

Introduction

These written standards apply to all Bucks County Continuum of Care (CoC) recipients. These standards must consistently be applied for the benefit of all program participants. These standards do not replace policies and procedures created by homeless services providers, but rather they provide an overall context for programs funded with U.S. Department of Housing and Urban Development (HUD) funding.

All CoC projects funded in the geographic area covered by the Bucks County Continuum of Care must comply with the [Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs final rule](#), 24 CFR Part 5, effective October 21, 2016.

CoC recipients agree to input participant level records through the HMIS system or VAWA-compliant comparable database and in accordance with approved Continuum of Care (CoC) data sharing policies and procedures.

Program Standards

Compliance with CoC Emergency Transfer Plan

The program complies with the CoC's Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and/or Human Trafficking.

Compliance with the Violence Against Women Act and Related HUD Rule

The program complies with [HUD's Violence Against Women Act \(VAWA\) rule](#) providing housing protections for domestic violence survivors. The final rule includes core protections across HUD programs covered by VAWA that ensure individuals are not denied assistance, evicted, or have their assistance terminated because of their status as survivors of domestic violence, dating violence, sexual assault, or stalking, or for being affiliated with a victim.

Data Entry and Compliance

The program enters all data on program participants into PA HMIS in an accurate and timely way (except for domestic violence providers) and responds to requests to improve data quality and support the annual submission of the CoC System Performance Measures, Point in Time Count, and LSA. The program complies with all PA HMIS agreements, policies and procedures, including (but not limited to):

1. Collaborative System User Agreement;
2. Policies and Standard Operating Procedures;
3. Privacy Policy; and
4. Collaborative Client Consent.

Defining Family and Preventing Family Separation

CoC funded programs must comply with HUD's definition of family in the Equal Access Rule. Under this definition, family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

According to the HUD Exchange: "What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. Further, a recipient or subrecipient receiving funds under CoC Programs cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity."

A program will make every effort to keep families together in shelter or housing unless separation is absolutely necessary for the family's well-being or safety. The age, gender or other characteristics of children under the age of 18 should not be used as the basis to deny the family enrollment in the program.

Coordinated Entry

The program must participate in and comply with the CoC's Coordinated Entry Policies & Procedures. This includes the following:

Limited English Proficiency (LEP) Policy

Persons calling the Bucks County Housing Link will be assigned to staff proficient in the person's primary language or will arrange appropriate translation or interpretative services.

Case Conferencing and Targeting Referrals for Admissions to participating projects

Households that are assessed and determined to need additional housing supports to resolve their homelessness will be referred to the CoC's Priority List through HMIS. This Priority List will be reviewed at minimum monthly during case conferencing to refer persons to appropriate housing programs.

Case conferencing is the process that the CoC uses to review, prioritize, and assign homeless households for available housing program openings. The CoC Lead facilitates the case conferencing meeting and all emergency shelter, rapid rehousing, and supportive housing partner organizations attend the case conferencing.

Case conferencing uses the CoC's community priorities as well as VI-SPDAT score to prioritize households for housing program openings. Community priorities include households with children, medical frailty, chronically homeless, and households fleeing domestic violence. In the instance when two households are identically prioritized for referral to the next available opening and both meet minimum program eligibility, the CoC will refer the household that first presented for assistance.

Housing Plans for All Participants

Case Managers of all program types (except Coordinated Entry) should work with program participants to develop a written strengths-based, participant-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 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.

Housing plans are required for Rapid Re-Housing program participants and must include information on financial assistance provided to the participant (see RRH Written Standards for details).

Housing Inventory Count and Point In Time Count Data

Emergency Shelter, Transitional Housing, Rapid Re-housing, Permanent Supportive Housing and other Permanent Housing programs must provide accurate and timely information for the Housing Inventory Count (HIC) and Point in Time Count (PIT) as requested by the CoC. Program staff are encouraged to participate in the PIT.

Housing Unit Inspection and Lead-Safe Housing

To ensure the safety and well-being of program participants, housing programs must ensure the habitability of temporary (i.e., shelter) and permanent (i.e., rental) housing units by:

1. Reviewing unit inspection policies with participants during intake;
2. Conducting and passing a unit inspection before signing a lease or providing a rental subsidy for both rental assistance and site-based programs;
3. Documenting housing units as habitable and keeping this documentation in the program participant's file;
4. Helping program participants address any safety or habitability concerns after move-in and assure them that their complaints will not affect their program eligibility;
5. Implementing written program policies related to damages, repairs, and landlord/ property manager grievances; and
6. Providing program participants with education and information on good tenancy and their housing rights as tenants.

To prevent lead poisoning in young children, the housing unit inspection process must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. The Lead Safe Housing Rule applies to all target housing that is federally owned and target housing receiving Federal assistance. For more information, see the [HUD Lead Safe Housing Rule resources](#) online.

Mainstream Benefits Access

Programs should assist program participants with identifying and accessing eligible mainstream benefits, including Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program

(SNAP), Medicaid, Health Insurance, Children's Health Insurance Program (CHIP) and SSI/SSDI, among others.

Nondiscrimination and Equal Opportunity

Programs must comply with all applicable civil rights and fair housing laws and requirements. Recipients and subrecipients of CoC Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 C.F.R. 5.105(a), including, but not limited to the following:

1. Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
2. Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance;
3. Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance;
4. Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance. Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability; and,
5. HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93.

Providing a Meaningful Voice for People with Lived Experience

Per Interim Rule 578.75 (g)(1) & 578.75 (g)(2), CoC-funded service provider organizations must involve households with lived experience in the design, governance and operations of homeless housing organizations and their programs. Organizations 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 the provision of CoC Program assistance. Meaningful engagement ensures that there is more than one person with lived experience to avoid tokenization. In addition, service providers must, to the extent possible, involve households with lived experience through employment, volunteering, operating the project and/or providing supportive services.

Providing Language Translation and Deaf/Hard of Hearing Services

Programs should make language translation services or deaf and hard of hearing services available to all households as needed during program intake and ongoing case management. Participant requests for these services must be honored within two business days.

Limited English Proficiency (LEP) Policy

Households receiving services through the CoC will be assigned to staff proficient in the person's primary language or will arrange appropriate translation or interpretative services.

Providing Reasonable Accommodations

Section 504 of the Rehabilitation Act of 1973, as amended, requires federally-assisted housing programs to provide reasonable accommodations for people with disabilities. A reasonable accommodation is a change, adaptation, or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. Reasonable accommodations may include, for example, those which may be necessary in order for the person with a disability to use and enjoy a dwelling, including public and common use spaces. Since persons with disabilities may have unique needs due to their disabilities, in some cases, simply treating persons with disabilities exactly the same as others may not ensure that they have an equal opportunity to use and enjoy a dwelling.

HUD's Section 504 regulations at 24 C.F.R. 8.27 require recipients to adopt suitable means to assure that information on available accessible units reaches otherwise qualified individuals with disabilities who need the features of those units. The regulations also require reasonable nondiscriminatory steps to maximize the utilization of accessible units. Under this process, whenever a unit that meets the requirements of the Uniform Federal Accessibility Standards (UFAS) or HUD's Deeming Notice for a person with a mobility disability becomes available for occupancy, a recipient shall first offer the unit to a qualified individual with disabilities currently residing in a non-accessible unit in the same project or comparable projects, under common control, who requires the accessible features. If there are no such persons currently residing in the recipient's projects, the recipient shall then offer the unit to the next available qualified individual with disabilities on its waiting list, provided that the person requires the accessibility features of the unit. The recipient shall skip over applicants without disabilities on the waiting list to offer the unit to the next qualified individual who requires the unit's accessibility features.

If no qualified applicant with disabilities requires the accessible features of a unit, and the recipient places a family where none of the family members have disabilities in that unit, the recipient may include language in the lease requiring this family to agree to move to a non-accessible unit, as soon as one becomes available that otherwise meets the family's needs.

Recordkeeping

Programs must maintain program participant and financial records in accordance with HUD guidelines and comply with the following requirements:

1. Records containing personally identifying information must be kept secure and confidential;
2. Records will include:

- a. Documentation of homelessness (per HUD guidelines for program type);
- b. A record of services and assistance provided to each participant;
- c. Documentation of program entrance through Coordinated Entry, including factors used to inform priority, vulnerability and housing placement;
- d. Documentation of all costs charged to the grant;
- e. Documentation that funds were spent on allowable costs;
- f. Documentation of the receipt and use of program income;
- g. Documentation of compliance with expenditure limits and deadlines for expenditure;
- h. Copies of all procurement contracts; and
- i. Documentation of amount, source and use of matching resources.

3. Records are retained for amount of time prescribed by applicable funding source.

Document Retention

The CoC prohibits the knowing destruction, alteration, mutilation, or concealment of any record, document, or tangible object with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any local, state, or federal department or agency.

Termination of Assistance and Grievance Procedures

Per 24 CFR 576.402, a program should terminate a participant only in rare circumstances to ensure the safety of participants or comply with regulations, laws, or a signed lease agreement. When possible, providers should work to rehouse the participant with necessary supports if leases are terminated. The program needs a written termination of assistance and grievance policy that should be given to all program participants before receiving services that includes a list of the participant's responsibilities and a description of the termination of assistance process.

If termination of assistance is necessary, the program should:

1. Utilize a Housing First approach to ensure the participant does not return to literal homelessness by using diversion practices and referrals other community services. Where possible, the program should provide another housing option or may request a transfer to another provider;
2. Provide written notice to the participant detailing the reason(s) for termination. The participant's file should document in writing any attempts (e.g., phone, mail, home visit, etc.) to contact the individual in order to discuss the pending termination;
3. Provide the participant with an opportunity to provide their objection in the form of a written or verbal grievance. If the grievance is presented verbally (in-person, over the phone, etc.), the program must document a summary of the grievance;
4. Document in writing the final outcome of the termination after the grievance process is completed and signed by the appropriate Case Manager or supervisor and kept in the participant's file; and,

5. Complete an Exit Assessment in PA HMIS

Training and Meeting Attendance

Direct program staff attend mandatory CoC trainings. Program staff should regularly attend CoC General meetings. Staff are encouraged to join committees for both entities.

Case Management Standards

Effective Case Management

Every Case Manager should have a written job description detailing their major responsibilities and required/preferred qualifications. Typical case management responsibilities include, but are not limited to:

1. Creative problem solving to help households to self-resolve their housing crisis;
2. Developing personalized housing or service plans that build on each participant's needs, goals and strengths;
3. Assistance with finding, moving into, and maintaining housing;
4. Coordinating access to services that help the participant achieve permanent housing stability, including referrals to childcare, education, employment and job training, financial literacy, health, legal services, public benefits access, substance use recovery and transportation, among others.

The frequency of case management services depends on the unique needs and situation of every program participant. Case Managers should be in direct contact with their program 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. Case Managers should practice assertive engagement but may not require participants to meet. In-person meetings with participants are preferred.

Case Managers should receive initial training and ongoing professional development opportunities relevant to their responsibilities and to the CoC's Written Standards.

Housing Focused Case Management

Case Managers practice Housing First which "connects people back to a home as quickly as possible, while making readily available the services that people may need to be stable and secure. Policies and regulations related to supportive housing, social and health services, benefit and entitlement programs, and other essential services do not create needless barriers to housing." Case Managers should be trained in Diversion and Housing Focused Case Management.

Person-Centered Case Management

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.” 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.

Documentation of Homelessness Status

HUD requires that each participant file contains documentation of homeless status and other program eligibility. Documentation of homelessness status is not conducted during Coordinated Entry.

If a Housing Program (RRH, TH, or PSH) enrolls a household who has not been previously documented by street outreach or emergency shelter, the housing Case Manager will need to perform the documentation of homelessness process.

HUD’s Order of Priority for the documentation of homelessness status is:

1. Third party documentation, including:
 - a. HMIS/comparable database record; or
 - b. Individual record of stay at emergency shelter, safe haven, or from a street outreach worker;
or
 - c. Oral or Written observation by an outreach or intake worker based on encounters with the individual or head of household that includes a description of the conditions where the individual or head of household was living or is currently living; or
 - d. Oral or Written observation by community member that has physically observed where the person or household was or is currently living. A community member includes but is not limited to, a shopkeeper, a building owner, or a neighborhood resident. A written referral by another housing/service provider must also be included.
2. Emergency Services or housing program staff documentation in writing, including information related to type of homelessness and self-verifying status based on observation, program record or HMIS record.
3. Written Self-certification from persons seeking assistance signed by the participant briefly explaining homelessness and that they have no resources or safe place to stay. It is the responsibility of the program staff member documenting homelessness status to obtain the highest level of documentation possible for each participant. Up to 25% of all participants served by a recipient can use self-certification for the full period of homelessness. At least 75% of participants served in an operating year for have third party documentation for at least 9 of 12 months of homelessness, though self-certification may be used for the remaining months.

Rapid Rehousing Standards

Rapid Rehousing is an intervention designed to help individuals and families exit homelessness quickly by returning to permanent housing without preconditions (including, but not limited to, sobriety, employment, absence of a criminal record, or income). Additionally, the resources and services provided are tailored to the unique needs of the household receiving assistance.

There are three core components that constitute a rapid rehousing program, all of which must be available to qualify as a rapid rehousing program. Although RRH programs must have each of the three components available, it is not required that a single entity provides all three services. Similarly, it is also

not required that any one household utilize all three in order to be considered a recipient of rapid rehousing.

Prioritization

Rapid rehousing programs must participate and accept eligible referrals through the Housing Link's case conferencing process. This process and the prioritization is outlined in the Housing Link Coordinated Entry Policies & Procedures.

Eligibility Criteria

- Households must meet the HUD definition of homelessness Category 1 or 4.
- CoC funded programs must follow any additional eligibility criteria set forth in the NOFO through which a project was funded and the grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.
- Once confirmed homeless or chronically homeless and enrolled in a Rapid Rehousing, the household continues to be eligible for that project regardless of where they reside while looking for housing.
 - This means the household: 1) has been determined eligible for the project, 2) is currently receiving services through the project (at a minimum case management), and 3) is actively looking for housing or has secured a spot in housing.
 - Individuals that are receiving rental assistance while enrolled in a Rapid Rehousing project do not need to be exited from that project if they are institutionalized for 90 days or fewer. Institutionalization includes jail, prison, nursing homes, hospitals, treatment facilities, and foster care. Recovery houses where the program participant pays rent are not considered institutional under HUD's definition.
 - If an individual is institutionalized for more than 90 days, the project may choose to stop renting the unit but keep the participant enrolled in the project. Upon release from the institution, that participant would remain enrolled in the project, and the subrecipient could resume rental assistance once a new unit is located.

Rapid Rehousing core components include the following: Housing Identification, Rent/Move-In Assistance (Financial) and Rapid Rehousing Case Management and Services.

Rental Assistance Eligibility

- Households are expected to contribute 30% of their gross income towards rent by program exit, depending on long-term housing stability plan. Households without income are not expected to contribute, however, they should be connected with resources as needed to assist with obtaining employment or benefits.
- The rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located. ([24 CFR 576.1036 Part B](#))
- Rental assistance can be provided for up to 24 months.

Determining Rent Reasonableness and Fair Market Rent

- Grantees providing rental assistance must develop and implement standards which ensure a mechanism for determining that the actual rental costs of units assisted are in compliance with HUD's Fair Market Rent, as provided under 24 CFR part 888 and complies with HUD's standard of "rent reasonableness" as established under 24 CFR 982.507. Rent Reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. See HUD's worksheet on rent reasonableness: www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc and Fair Market Rent Documentation System: https://www.huduser.gov/portal/datasets/fmr.html#2019_query.
- Housing programs and housing Case Managers are responsible for determining what documentation is required in order to ensure that the rent reasonableness standard is met for a particular unit. Housing programs should determine rent reasonableness by considering the gross rent of the unit and the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities to be provided by the owner.
- To calculate the gross rent for purposes of determining whether it meets the rent reasonableness standard, consider the entire housing cost: rent plus the cost of any utilities that must, according to the lease, be the responsibility of the tenant. Utility costs may include gas, electric, water, sewer, and trash. However, telephone, cable or satellite television service, and internet service should be excluded. The gross rent also does not include pet fees or late fees that the program participant may accrue for failing to pay the rent by the due date established in the lease.
- Comparable rents can be checked by using a market study of rents charged for units of different sizes in different locations or by reviewing advertisements for comparable rental units. For example, a program participant's case file might include the unit's rent and description, a printout of three comparable units' rents, and evidence that these comparison units shared the same features (location, size, amenities, quality, etc.). Another acceptable method of documentation is written verification signed by the property owner or management company, on letterhead, affirming that the rent for a unit assisted with CoC Program funds is comparable to current rents charged for similar unassisted units managed by the same owner.

Vouchers

- Households that obtain Housing Choice Vouchers while enrolled in rapid rehousing programs should not be exited for at least 90 days after voucher is in place and program participant is successfully paying their portion of the rent (as applicable).
- The goal of Rapid Rehousing is long term housing stability, not just rent payment. Providing households with a minimum of an additional 90 days of case management after their voucher starts paying rent helps to ensure that they not only achieve but maintain their housing.

- Ensure the household is aware of the requirements of the voucher – annual inspection, reporting income changes, and reporting changes to household members to reduce risk of noncompliance with Bucks County Housing Authority.
- Case managers are responsible for contacting the Bucks County Housing Authority to make them aware of who the case management point of contact is for the household at enrollment. Supervisors of Rapid Rehousing case managers are encouraged to also let BCHA know that you are an additional point of contact for the household.
- Case managers are responsible for ensuring that the Use & Occupancy has been obtained and the required inspections have taken place prior to move.

Case Management

- Case managers are expected to attempt to check in with program participants a minimum of every week once the household is in housing for at least the first 60 days and should be conducted more frequently for higher acuity participants. Case management must continue for a minimum of 30 days after financial assistance ends prior to program discharge. Depending on acuity level, case management may need to continue longer, up to a maximum of 6 months, to ensure housing stability. Participants are not required to accept case management. Case managers are encouraged to use creative and assertive engagement practices.
- Issues with landlords, such as lease violations, problems with other tenants, or need for additional supports, are most likely to occur in the first 60-90 days in housing.
- Meetings with households should take place in person when feasible and at minimum once per month. Households experiencing chronic homelessness should have in-person meetings at minimum once every two weeks.
- Supportive Services screenings should take place at project entry, at move in, at annual assessment, and 30 days prior to exit.
- A primary goal of case management for participants in Rapid Rehousing is to ensure that the household has the tools necessary to maintain permanent housing after their enrollment ends. To do this, case managers are expected to evaluate the need for and connect the household members with supportive services that go beyond the scope of the Rapid Rehousing case management.

Out of County Placement

Households may be placed out of county with a Rapid Rehousing program and are eligible for both case management and rental assistance for the full term allowed by the project. Providers accepting households where placement out of county is possible should confirm the ability of their case managers to adequately support the program participant in their chosen location.

Program Discharge

Rapid rehousing providers must notify housing location, and any other active case managers for the participant that the provider has releases with, when discharging a participant that is in permanent housing but is being discharged prior to achieving housing stability.

The provider is also required to complete a physical visit to the participant's housing unit to ensure that it is still in good status prior to discharge. A coordinated entry note outlining the visit and general state of the unit must be recorded in HMIS on the head of household's record.

Permanent Supportive Housing Standards

Permanent Supportive Housing (PSH) for persons with disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist persons experiencing homelessness with a disability or families with an adult or child member with a disability achieve housing stability.

Eligibility Criteria for 100% Dedicated Projects

- Households must meet the HUD definition of homelessness Category 1 and HUD's chronically homeless status.
- CoC funded programs must follow any additional eligibility criteria set forth in the NOFO through which a project was funded and the grant agreement.
- Programs partially funded through Bucks County BH/DP must also have a mental health diagnosis and completed MH residential referral form.

Prioritization

- PSH programs that are partially funded by Bucks County BH/DP must follow the MH PSH Case Conferencing Guidance and process.
- The following HUD Orders of Priority will be used:
 - Chronic homelessness
 - Severity of Service Needs
 - Longest cumulative time homeless
- If there is no person in the Bucks County Housing Link system that qualifies as chronically homeless, or if no chronically homeless person is willing to engage in housing services at the time a bed becomes available, then the bed will be filled using the below prioritization process:
 - a. Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs - An individual or family who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.
 - b. Homeless Individuals and Families with a Disability with Severe Service Needs - no minimum length of time homeless required.
 - c. Homeless Individuals and Families with a Disability without Severe Service Needs.
 - d. Homeless Individuals and Families with a Disability Coming from Transitional Housing.

Within each category above, if there is more than one individual meeting the need, the following considerations should be applied for prioritization:

- i. RRH Subsidy ending in next 6 months.

- ii. Longest Cumulative Time homeless.

Disability Verification

The CoC recipient will ensure the PSH program is serving individuals with serious mental illness, who have the acceptable evidence of the qualifying disability. The acceptable evidence of a qualifying disability includes:

- A PA licensed professional to diagnose and treat the disability and their certification that the disability is expected to be long and continuing or of indefinite duration and substantially impede the individual's ability to live independently; HUD -090103 Form
- Written verification from the Social Security Administration.
- The receipt of a disability check (e.g., Social Security Disability Insurance check or Veterans Disability compensation).
- Intake staff-recorded observation of disability, within 45 days of application for assistance, accompanied by evidence above; or
- Other documentation approved by HUD.

Transitional Housing Standards

Transitional Housing (TH) is designed to provide homeless individuals and families with interim stability and support to successfully move into and maintain permanent housing.

Eligibility Criteria

- Households must meet the HUD definition of Category 1 or 4 homeless.
- CoC funded programs must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.

Minimum Standards of Assistance

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Support services must be provided throughout the duration of stay in transitional housing. Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month and that ends in 24 months and cannot be extended.

Prioritization

Transitional Housing programs must participate and accept eligible referrals through the Housing Link's case conferencing process. This process and the prioritization is outlined in the Housing Link Coordinated Entry Policies & Procedures.

Appendix A: Definitions

Chronically Homeless

1. A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - a. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - b. Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Appendix B: HUD Homeless Categories

- Category (1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - Has a primary nighttime residence that is a public or private place not meant for human habitation;
 - Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
 - Is exiting an institution where they have resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- Category (2) Individual or family who will imminently lose their primary nighttime residence, provided that:
 - Residence will be lost within 14 days of the date of application for homeless assistance;
 - No subsequent residence has been identified; and
 - The individual or family lacks the resources or support networks needed to obtain other permanent housing.
- Category (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - Are defined as homeless under the other listed federal statutes
 - Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless application
 - Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
 - Can be expected to continue in such status for an extended period of time due to special needs or barriers.
- Category (4) Any individual or family who:
 - Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, or stalking;
 - Has no other residence; and
 - Lacks the resources or support networks to obtain other permanent housing.

Appendix C: HUD Recordkeeping Requirements

- Category (1) Literally Homeless:
 - Written observation by the outreach worker; or
 - Written referral by another housing or service provider; or
 - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - For individuals exiting an institution – one of the forms of evidence above and:
 - Discharge paperwork or written/oral referral, or
 - Written record of intake worker’s due diligence to obtain evidence and certification by individual that they exited institution.
- Category (2) Imminent Risk of Homelessness:
 - A court order resulting from an eviction action notifying the individual or family that they must leave; or
 - For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
 - A documented and verified oral statement; and
 - Certification that no subsequent residence has been identified; and
 - Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing.
- Category (3) Homeless under other Federal statutes:
 - Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
 - Certification of no PH in last 60 days; and
 - Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and
 - Documentation of special needs or 2 or more barriers.
- Category (4) Fleeing/Attempting to Flee DV:
 - For victim service providers:
 - An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.
 - For non-victim service providers:

- Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
- Certification by the individual or head of household that no subsequent residence has been identified; and
- Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.