

VERMONT BALANCE OF STATE CONTINUUM OF CARE

CONTINUUM OF CARE PROGRAM

WRITTEN STANDARDS

September 2019

CoC Co-Chair (print name): _____ Date: _____

CoC Co-Chair (signature): _____

CoC Co-Chair (print name): _____ Date: _____

CoC Co-Chair (signature): _____

Adopted on September 17, 2019

Introduction

These standards are a reference for all Continuum of Care Program (CoC) recipients and subrecipients regarding the established community-wide expectations. They clarify the VT BoS CoC's priorities and outline the current minimum standards for all CoC Program funded projects within the CoC's geography. All projects receiving CoC Program funding are required to abide by these written standards. The CoC strongly encourages projects that do not receive CoC Program funding to accept and utilize these standards.

The Emergency Solutions Grant (ESG) project written standards can be found at: [Office of Economic Opportunity Website](#)

These standards are to be reviewed regularly in order to ensure the system of providing assistance is transparent, ensure priorities are clear to all recipients, and use the CoC's limited resources strategically.

All Project Types

1. Projects must have written policies and procedures and consistently apply them to all participants.
2. Projects must serve eligible participants and keep written documentation of eligibility criteria and decisions.
3. Community Partnership
 - a. Projects must coordinate with other targeted homeless services within the CoC.
 - b. Projects must coordinate with mainstream resources in the CoC including housing, social services, employment, education and youth and young adult programs for which participants may be eligible.
4. Educational Services for Children and Youth
 - a. Projects serving families with children and youth must demonstrate that they are:
 - i. Establishing policies and practices that are consistent with the education subtitle of McKinney-Vento Act and other laws relating to education and related services to homeless people (e.g. Head Start, Individuals with Disabilities Education Act, Higher Education Act), including:
 1. Informing homeless families and youth and young adults of their eligibility for McKinney Vento education services during the intake process;
 2. Not requiring that children enroll in new schools as a condition of entry;
 3. Not establish program requirements that prohibit children from remaining in their school of origin; and
 4. Develop relationships with colleges to access Higher Education Services specifically for homeless youth and young adults (Higher Education Act).
 - b. Projects serving families with children and youth must designate a staff person to ensure that minors are enrolled in school and connected to services in the community including programs such as:
 - i. Head Start
 - ii. Part C of the Individuals with Disabilities Education Act and
 - iii. McKinney-Vento education services.The designated staff person should participate in service planning where there are extensive or significant unmet educational needs.
5. Assistance with accessing Mainstream Benefits, including health insurance access

- a. Case managers/housing specialists shall systematically assist participants in completing applications for mainstream benefits.
 - b. Projects shall supply transportation assistance either directly or through referral to participants to attend mainstream benefit appointments, employment training, or jobs.
 - c. Projects shall have staff systematically follow-up to ensure mainstream benefits are received by participants.
 - d. Projects are required to provide support and assist eligible participants to apply for healthcare options available through the Affordable Care Act and other funding sources.
6. Nondiscrimination Requirements
- a. CoCs, recipients and subrecipients must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable.
7. Coordinated Entry System (CES)
- a. All CoC projects must participate in the CoC's Coordinated Entry System (CES). All admissions for CoC Program funded projects will be originated by a referral from the CES. See Coordinated Entry policy and procedure manual for details.
8. Data and Reporting
- a. Projects must participate in the CoC's Homeless Management Information System (HMIS) or submit data from a comparable database if they are a designated victim services provider. Participation includes compliance with HUD HMIS Data and Technical Standards with support from HMIS lead agency.
 - b. Projects must submit an Annual Performance Report (APR) to the Department of Housing and Urban Development (HUD) and the CoC each year.
 - c. Projects must respond to requests from the HMIS Lead or CoC to improve data quality and support the annual submission of CoC System Performance Measure and Annual Homeless Assessment Report (AHAR)..
9. Project Recordkeeping Requirements for Recipients and Subrecipients
- a. Projects will follow applicable record keeping requirements in 24 CFR 578.103.
 - b. Homeless Documentation
 - i. Recipients must maintain and follow written intake procedures to ensure compliance with the definition of chronically homeless¹ and homeless² for their CoC project. These procedures establish the order of priority for obtaining evidence as:
 - 1. Third-party documentation;
 - 2. Intake worker observations; and
 - 3. Certification from the person seeking assistance.
 - 4. NOTE: 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,

¹ <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>

² <https://www.hudexchange.info/resource/1928/hearth-defining-homeless-final-rule/>

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

- c. Disability Documentation, if applicable to project eligibility, must be obtained from a qualified third party who is licensed by Vermont to diagnose and treat the condition being documented. Intake staff-recorded observation of disability that within 45 days of the date of application for assistance is confirmed by a licensed professional as stated above is also acceptable. *NOTE: Use of the option to document disability after program admission must be used cautiously due to possible financial impact if documentation is not obtained as expected.*
- d. Property Standards
 - i. Housing Quality Standard (HQS) compliance documentation must be present for all CoC Program projects receiving leasing, rental assistance and operating assistance.
 - ii. Environmental Review³ compliance documentation must be present for all projects.
 - iii. Lead Based Paint Visual Assessment for all residential properties built before 1978 where a child under the age of six or a pregnant woman is, or will be, living in the unit must be present.

Homeless Prevention Projects

10. The VT BOS CoC partners with the Agency of Human Services, Office of Economic Opportunity, who is the Emergency Solutions Grant (ESG) recipient. Please see the Emergency Solutions Grant Written Standards for homeless prevention guidelines.

Emergency Shelter Projects

11. The VT BOS CoC partners with the Agency of Human Services, Office of Economic Opportunity, who is the Emergency Solutions Grant (ESG) recipient. Please see the Emergency Solutions Grant Written Standards for emergency shelter guidelines.

CoC Transitional Housing Projects

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

Eligibility Criteria

- Participants must meet the applicable HUD definition of homelessness⁴

Minimum Standards of Assistance

12. Participant length of stay cannot exceed 24 months⁵.
13. Project staff must provide assistance to participants to transition to permanent housing.
14. An appropriate level of support services must be provided throughout the duration of stay in transitional housing.

³ <https://www.hudexchange.info/resource/4045/coc-program-environmental-review-flow-chart/>

⁴ Homeless definition standards can be found in the project rule, local RFPs, and NOFA documents as applicable.

⁵ A homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living. However, HUD may discontinue assistance for a transitional housing project if more than half of the homeless individuals or families remain in that project longer than 24 months. (CoC Program Interim Rule, 578.79, <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>)

15. Project participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months⁶.
16. Termination of Housing
 - a. Terminations may only occur in the most severe cases after a project has examined all extenuating circumstances regarding violations.
 - b. The project staff will work closely with participant and other housing providers to assess other viable housing options.
17. All CoC TH programs are required to incorporate Housing First Principles whenever possible.

Rapid Re-Housing Projects

Rapid Re-Housing is available to help those who are literally homeless be quickly and permanently housed. Rapid Re-Housing Projects (RRH) provide housing relocation and stabilization services and short or medium term rental assistance as needed to help a homeless individual or family move as quickly as possible to permanent housing and achieve stability in that housing. Please note that Rapid Re-Housing funds are available through both CoC Program and ESG.

Eligibility Criteria (CoC)

- Participants must meet the applicable HUD definition of homelessness.
- Participants lack identifiable financial resources and/or support networks.

Minimum Standards of Assistance (CoC)

18. Admission priority will be provided to families and individuals experiencing homelessness with the most urgent need, as determined by the CES prioritization policy for RRH projects.
19. Projects may provide rental assistance to eligible participants for up to 24 months.
20. Each project will establish a policy and procedure to determine the percentage or amount of rent each program participant must pay.
21. Each project will establish a policy regarding any limits in the amount of rental assistance a participant may receive.
22. Housing First Principles must be followed by all RRH projects.

Eligibility Criteria and Minimum Standards of Assistance (ESG)

23. The VT BOS partners with the Agency of Human Services, Office of Economic Opportunity, who is the Emergency Solutions Grant (ESG) recipient. Please see the Emergency Solutions Grant Written Standards for ESG funded RRH guidelines.

Permanent Supportive Housing Projects

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

⁶ See previous footnote on extension of TH stays.

Eligibility Criteria

- Participants must meet the applicable HUD definition of homelessness⁷
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

Minimum Standards of Assistance

24. Admission priority will be provided to families and individuals experiencing homelessness with the most urgent need, as determined by the CES prioritization policy for PSH projects.
25. No Designated Length of Stay - Program participants will be provided housing without a designated length of stay that permits them to live as independently as possible.
26. Lease Agreement - The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.
27. Supportive Services
 - a. Supportive services will be designed to meet the needs of program participants and must be made available to the program participants.
 - b. Supportive services to enable program participants to live as independently as possible must be provided throughout the duration of their time in the project.
 - c. Supportive service participation will not be required as a condition to maintain housing.
 - d. Projects will conduct an annual review of individual participants' service need and offer additional services if necessary.
 - e. Projects will conduct an annual review of the service needs of the project and should adjust services accordingly⁸. Unmet needs will be identified and brought to the local and Balance of State CoC meeting for discussion.
28. Housing Units
 - a. Two individuals in a shared housing situation will have their own lease and their own bedroom unless the two individuals are presented together as a household.
29. Termination of Housing
 - a. Terminations may only occur in the most severe cases after a project has examined all extenuating circumstances regarding violations.
 - b. Termination of occupancy of housing may only occur in cases of noncompliance with the lease or failure of tenant to carry out obligations under landlord and tenant law.
 - c. Legal court eviction proceedings will be used in order to terminate tenancy from a housing unit.
 - d. Participants may not be terminated involuntarily from housing for refusal to participate in services or for violating program rules that are not related to lease compliance.
 - e. Provider will work closely with participant and other housing providers to assess other viable housing options if termination is unavoidable.

⁷ Homeless definition standards can be found in the project rule, local RFPs, and NOFA documents as applicable.

⁸ CoC Program Interim Rule, 578.53 (a) (2) <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

30. Housing First Principles will be incorporated into all PSH projects.
- a. Housing First is a programmatic and systems approach that centers on providing people experiencing homelessness with housing quickly and then providing services as needed.
 - b. Separation of Housing and Treatment: Housing is not contingent on compliance with services – participants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction.
 - c. Participants have choice from available housing options in an integrated community setting.

Prioritization of Housing Resources

These standards establish the community-wide expectations of how resources are to be targeted with the community separate from meeting eligibility requirements, and specific to prioritizing assistance according to highest needs and greatest barriers towards obtaining and maintaining housing on their own. The VT BOS CoC has adopted HUD Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing⁹. Standards for compliance with the notice are listed below in PSH Availability section.

Minimum Standards of Assistance

31. Recipients and subrecipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on the project specific criteria contained in these standards.
32. Documentation standards for showing outreach due diligence include:
- a. Written project intake procedures showing the adoption of the written standards.
 - b. Documentation of the process and results used to determine the severity of service needs.
 - c. Documentation of the determination that no higher prioritized population members were present or willing to accept the project bed including:
 - i. Written evidence of outreach efforts to locate eligible persons
 - ii. Specific numbers of eligible participants that refused assistance
 - iii. Attempts to engage person who refused assistance.
33. PSH Availability for Dedicated or Prioritized Beds – See VCEH Coordinated Entry Permanent Supportive Housing [Policy](#) for prioritization standards
34. PSH Availability for Non-Dedicated or Non-Prioritized Beds - See VCEH Coordinated Entry Permanent Supportive Housing [Policy](#) for prioritization standards

⁹ <https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>