



EscaRosa Coalition on the Homeless

## Written Standards

For

Service Providers regarding

Street Outreach, Emergency Shelter,

Rapid Rehousing, Homeless Prevention and

Permanent Supportive Housing

## Activities

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## Introduction

The EscaRosa Coalition on the Homeless (ECOH) is the designated Lead Agency for Escambia and Santa Rosa Counties in Florida and as such serves as the Continuum of Care for those counties. The ECOH has developed the following minimum standards for providing assistance with Emergency Solutions Grants (ESG) funds as required by 24CFR 576.400(e). These minimum standards serve as the guiding principles for the programs and each entity may require additional operating procedures.

### REQUIREMENT OF ALL PROGRAMS:

**PROHIBITION AGAINST INVOLUNTARY FAMILY SEPARATION:** The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to any housing or shelter receiving funding from either ESG or CoC (578.93(e))

**NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE OUTREACH:** Minimum standards shall comply with the requirements for nondiscrimination, equal opportunity and affirmative outreach identified in §576.407 and 578.93(a-b).

**FAITH-BASED ACTIVITIES:** Minimum standards for faith-based activities (24 CFR 576.406 and 578.87) are:

- Providers receiving ESG/CoC funding shall not engage in inherently religious activities as part of the ESG/CoC-funded programs or services. Such activities must be offered separately from ESG/CoC-funded programs and services and participation must be voluntary.
- A religious organization receiving ESG/CoC funding retains independence from government and may continue with its mission provided that ESG/CoC funds are not used to support inherently religious activities. An ESG/CoC-funded organization retains its authority over its internal governance.
- An organization receiving ESG/CoC funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs.
- ESG/CoC funding shall not be used for the rehabilitation of structures used specifically for religious activities, but may be used for rehabilitating structures that are used for ESG/CoC-eligible activities.

**CENTRALIZED COORDINATED ASSESSMENT REGISTRATION:** The Centralized Access System is to be used by all entities. Consumers are to be rank and prioritized according to need, vulnerability, and availability of resources. Rapid Rehousing providers must place higher priority for consumers coming from Emergency Shelters, streets and DV shelters.

**GRIEVANCE PROCEEDURE/CUSTOMER COMPLAINT:** This Customer Complaint Policy aims to not only provide a framework for employees to work with when handling complaints from customers, but also to ensure consistency within EscaRosa Coalition on the Homeless in handling and resolving complaints from customers. Addressing customer complaints helps the Company in following through on our commitment to provide quality products, services and customer service.

EscaRosa Coalition on the Homeless defines the term "complaint" as any expression of dissatisfaction or grievance made by a customer or member of the public about any EscaRosa Coalition on the Homeless product or service, not including a request for information.

EscaRosa Coalition on the Homeless customer service representatives will provide reasonable information and assistance to customers to ensure that complaints are made effectively. Complaints may be made in any of the following ways:

- Via telephone at 850-439-3009
- Via email at [info@ecoh.org](mailto:info@ecoh.org)
- Via mail at PO Box 17222, Pensacola FL 32522

Complaints will be acknowledged upon receipt by the Company and customers will be provided with a reference number that can be used to identify the progress of their complaint.

Complaints will be processed in a timely and efficient manner. Continuous improvement and training will be used to confirm complaints are resolved promptly and courteously. Managing our customers' expectations realistically is our goal. This involves the careful examination of each complaint and the provision of a resolution offered on the basis of that analysis.

Complaints will be recorded and analyzed to insure that our company management processes comply with this Policy. Trends will be identified, and feedback will be provided to the relevant departments to improve current processes.

Our mission is to resolve customer complaints immediately, rather than delaying the resolution. When necessary, customers will be kept informed of the progress of their complaint and the company's internal escalation process.

When a customer has exhausted his or her avenues for addressing the complaint within the company or finds those avenues unacceptable, he or she can be advised of external channels for escalation, such as the EscaRosa Coalition on the Homeless Board of Directors.<sup>1</sup>

The ECOH will notify the complainant of receipt of their initial complaint within a 72 hour period and if the complaint cannot be resolved immediately, will strive to resolve the complaint within 30 days.

Complaints resulting from a sub awardee's decision or action are to go through the sub awardee grievance process first. The sub awardee will notify ECOH at the time a complaint is filed. If the complaint is not resolved or the complainant is not satisfied with the decision at the sub awardee level they may appeal the decision to the ECOH.

### **Policies and Procedures Regarding Street Outreach Services**

#### **Activity Objectives:**

- To reduce the number of unsheltered homeless persons on the street
- To provide unsheltered homeless with essential services to address their immediate needs including but not limited to engagement, case management, emergency health and mental health services and transportation. These services will be provided on the streets, parks, abandoned buildings, bus stations, campgrounds and such settings where unsheltered persons are staying

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<sup>1</sup> EscaRosa Coalition on the Homeless Employee Handbook, page 52

Individual and Family (Client) eligibly:

- Literally Homeless : OR
- Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria of Literally Homeless) AND
  
- Must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter

Documentation of eligibility:

- Evidence of homelessness (in order of priority)
  - (a) Third party documentation, OR
  - (b) Case Worker written observation, OR
  - (c) Certification form signed by the person seeking assistance

Policy and Procedures for Where and How Clients Will Be Served

POLICY: The Street Outreach program will actively engage the unsheltered homeless population for the purposes of providing immediate support, interventions and connections with homeless assistance programs and/or mainstream social services and housing programs where the unsheltered homeless population is located.

PROCEDURES:

1. Weekly visits to encampments, congregate sites, parks, and other places homeless stay
2. Participate in and/or lead the unsheltered PIT count
3. Continued participation with the community-wide EscaRosa Coalition on the Homeless HMIS, membership, and communication
4. Establish trust with the individual or family focusing on building positive relationships with those who find themselves in this predicament
5. Create a safe presence, initiating non-threatening conversation
6. Record and collect minimum data and assess needs

Policies and Procedures for Targeting and Providing Essential Services

POLICY: Providers of Street Outreach services shall target unsheltered homeless individuals and families as defined above.

PROCEDURES:

1. An initial need and eligibility assessment will be offered and those qualifying will be provided the following as needed: engagement, case management, emergency health and mental health referrals, transportation, documentation, or other appropriate services specific to their needs.
2. When appropriate and based on the individual's needs and wishes, the provision of or referral to rapid rehousing services that can quickly assist the

client to obtain safe, permanent housing shall be prioritized over the provision of or referral to emergency shelter or transitional housing.

#### Policy and Procedures for HMIS Participation

POLICY: Participation in HMIS is a requirement of any service provider receiving funding from or through ECOH, to insure data collection, tracking of services and documentation of outcomes.

##### PROCEDURES:

1. For New Providers: Registration, payment of membership and licensing fees, training, access to HMIS
2. For Existing Providers: Renewal of membership and licensing and remain compliant with HUD data quality standards.
3. For All Providers:
  - a. Complete HMIS intake data for all clients served and update and maintain the information on referrals and services provided until client exits program
  - b. Maintain documentation of persons and families seeking assistance, even if determined to be ineligible
  - c. Follow confidentiality of information process for the maintenance of all records containing personally identifying information (this includes confidential intake, data entry completed by personnel that has been trained, the computer used for data entry meets the HUD/HMIS confidentiality requirements, and hard copies of all records have limited access and kept for a minimum of five (5) years.)

#### Policy and Procedures for Coordination of Mainstream Benefits/Coordinated Assessment

POLICY: Coordination among emergency shelter service providers, essential service providers, homeless prevention and rapid rehousing assistance providers and mainstream service providers is a requirement of any service provider receiving funding from or passed through the ECOH to insure minimum client disruption and maximum client service.

Connections with other resources consist of assisting each client to obtain if applicable:

- Permanent housing
- Medical health treatment
- Behavioral health services
- Veteran's Benefits
- Counseling
- Supervision
- Other services needed for independent living
- Medicaid/Medicare
- Food stability programs:
  - Supplemental Nutrition Assistance Program
  - Women Infants and Children
- Supplemental Security Income/Social Security Disability Insurance

##### PROCEDURES:

1. Use of the coordinated assessment form

2. Participation in HMIS and documentation of referrals
3. Membership in and communications with ECOH and area service providers

### **Policies and Procedures Regarding Emergency Shelter Services**

#### Activity Objectives

- To provide emergency shelter and safe environment on a temporary basis for homeless individuals and families as they transition from homelessness into permanent housing.

#### Individual and Family (Client) Eligibility

Must meet one of the following categories of homelessness

- Category 1 - Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  1. Has a primary nighttime residence that is a public or private place not meant for human habitation OR
  2. 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
  3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
- Category 2 - Individual or family who will imminently lose their primary nighttime residence provided that:
  1. Residence will be lost within 14 days of the date of application for homeless assistance AND
  2. No subsequent residence has been identified; AND
  3. 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:
  1. Are defined as homeless under the other listed federal statutes
  2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application
  3. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; AND
  4. 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:
  1. Is fleeing or is attempting to flee domestic violence
  2. Has no other residence AND
  3. Lacks the resources or support networks to obtain other permanent housing

#### Documentation of Eligibility

- For clients meeting Category 1, Category 3 and Category 4 definitions:

1. Third party documentation through an organization or outreach worker who has assisted the individual or family in the past or is currently assisting them, and how long they have been homeless, signed and dated.
  2. Certification form signed by individual requesting shelter.
- For clients meeting Category 2 definitions
    1. Eviction notice – Families are considered homeless if they are within 14 days of the eviction, or
    2. If there is no formal eviction process – a self-declaration from the client explaining the circumstances and any supporting documentation
    3. If the person is staying with family or friend and can no longer reside at that address – a letter from the family or friend stating they can no longer live in their home along with contact information for verification (address and phone number)
    4. If the person is leaving an institution after a short term stay (less than 90 consecutive days) who previously resided on the street or in an emergency shelter – Verification from the institutions staff that the participant has been residing in the institution for less than 90 days and can verify the person is homeless and provide information on their previous living situation and documentation and verification of efforts to confirm that these circumstances are true

Policy and Procedures on assessment, admission, termination, re-admission, discharge, and safety

POLICIES:

- ASSESSMENT: All providers shall use the coordinated assessment form (a victim service provider may choose not to use the coordinated form and system however must use a system that meets HUD’s minimum requirements). Each provider may use an additional assessment if necessary for their specific services.
- ADMISSION: Providers of Emergency Shelter Services shall admit individuals and families who meet the HUD definition of “homeless” and the agencies’ written eligibility criteria.
- TERMINATION: If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted.
- RE-ADMISSION: Termination will not bar the provider from providing later additional assistance to the same family or individual.
- DISCHARGE: Families and individuals shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Length of Stay limitations shall be determined by the individual service provider’s policies and clearly communicated to the program participants. All efforts should be made to discharge the individual or family into permanent housing and if that is not possible, discharge to a transitional shelter.
- SAFETY: Safety and shelter safeguards shall be determined by the individual service provider’s (including Special Population providers) policies and clearly communicated to program participants.

Policies and Procedures for Targeting and Providing Essential Services

Each emergency shelter may have a specific category of client pertaining to their particular outreach activities (Single Men, Single Women, Families with Children, Youth). The continuum may prioritize the

funding of providers based upon the clients that are served by the provider based upon the needs of the community reflected by Point in Time Counts, as well as the Continuum's Plan for ending homelessness.

In communities and areas that do not have emergency shelters and where hotel/motel vouchers are provided, the following priorities shall be utilized:

- #1 – Families with Children
- #2 – Persons fleeing from Domestic Violence
- #3 – Single Males or Single Females

NOTE: HUD assumes that a recipient or sub recipient ("provider") that makes eligibility for or placement into single sex emergency shelters or other facilities will place a potential client (or current client seeking a new assignment) in a shelter or facility that corresponds to the gender with which the person identifies, taking health and safety concerns into consideration. A client's or potential client's own views with respect to personal health and safety should be given serious consideration in making the placement. HUD assumes that a provider will not make an assignment or reassignment based on complaints of another person when the sole stated basis of the complaint is a client or potential client's non-conformance with gender stereotypes.

#### Grievance procedures

POLICY: Each provider shall have a written grievance procedure which is to be provided to the participant upon entering the shelter.

#### Policy and Procedures for HMIS Participation

POLICY: Participation in HMIS is a requirement of any service provider receiving funding from or through ECOH, to insure data collection, tracking of services and documentation of outcomes.

#### PROCEDURES:

1. For New Providers: Registration, payment of membership and licensing fees, training, access to HMIS
2. For Existing Providers: Renewal of membership and licensing and remain compliant with HUD data quality standards.
3. For All Providers:
  - a. Complete HMIS intake data for all clients served and update and maintain the information on referrals and services provided until client exits program
  - b. Maintain documentation of persons and families seeking assistance, even if determined to be ineligible
  - c. Follow confidentiality of information process for the maintenance of all records containing personally identifying information (this includes confidential intake, data entry completed by personnel that has been trained, the computer used for data entry meets the HUD/HMIS confidentiality requirements, and hard copies of all records have limited access and kept for a minimum of five (5) years.)

#### Policy and Procedures for Coordination of Mainstream Benefits/Coordinated Assessment

POLICY: Coordination among emergency shelter service providers, essential service providers, homeless prevention and rapid rehousing assistance providers and mainstream service providers is a requirement of any service provider receiving funding from or passed through the ECOH to insure minimum client disruption and maximum client service.



Connections with other resources consist of assisting each client to obtain if applicable:

- Permanent housing
- Medical health treatment
- Behavioral health services
- Counseling
- Supervision
- Other services needed for independent living
- Medicaid/Medicare
- Food stability programs:
  - Supplemental Nutrition Assistance Program
  - Women Infants and Children
- Supplemental Security Income/Social Security Disability Insurance

PROCEDURES:

1. Use of the coordinated assessment form
2. Participation in HMIS and documentation of referrals
3. Membership in and communications with ECOH and area service providers

### **Policies and Procedures Regarding Homeless/Rapid Rehousing Services**

#### Activity Objectives

- The Continuum recognizes that a permanent place to live results in a more stabilized family unit and healthy individual. Therefore all efforts will be made to 1) permanently house those who are experiencing homelessness as quickly as possible and 2) prevent a person or family from becoming homeless.

#### Individual and Family (Client)

- ESG Funded programs –
  - Income at or below 30% of Area Median, (for Rapid Rehousing income limits AND
  - meeting either Category 1 or 4 definition of homelessness
- Category 1 - Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  1. Has a primary nighttime residence that is a public or private place not meant for human habitation OR
  2. 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
  3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
- Category 4 – Any individual or family who:
  1. Is fleeing or is attempting to flee domestic violence
  2. Has no other residence AND  
Lacks the resources or support networks to obtain other permanent housing

#### Documentation of Eligibility

- For Rapid Rehousing – An income assessment is not required at initial evaluation however at re-evaluation the participant’s household must have an annual income that does not exceed 30% of median family income for the area as determined by HUD.
- For clients meeting Category 1, Category 3 and Category 4 definitions:
  1. Third party documentation through an organization or outreach worker who has assisted the individual or family in the past or is currently assisting them, and how long they have been homeless, signed and dated.
  2. Certification form signed by individual requesting shelter.
- For clients meeting Category 2 definitions
  1. Eviction notice – Families are considered homeless if they are within 14 days of the eviction, or
  2. If there is no formal eviction process – a self-declaration from the client explaining the circumstances and any supporting documentation
  3. If the person is staying with family or friend and can no longer reside at that address – a letter from the family or friend stating they can no longer live in their home along with contact information for verification (address and phone number)
  4. If the person is leaving an institution after a short term stay (less than 90 consecutive days) who previously resided on the street or in an emergency shelter – Verification from the institutions staff that the participant has been residing in the institution for less than 90 days and can verify the person is homeless and provide information on their previous living situation and documentation and verification of efforts to confirm that these circumstances are true

Policies and Procedures for Targeting and Providing Essential Services

POLICY:

For those families or individuals seeking Rapid Rehousing and meeting eligibility criteria priority will be given (in order):

#1 - Are currently living in a publicly or privately operated shelter designated to provide temporary housing (congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state or local government programs for low income individuals)

#2 - Are currently living in a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings including a car, park, abandoned building, bus station, or campground

#3 - Are being discharged from an institution where he or she 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

#4 – Are homeless in accordance with the McKinney-Vento Act (as amended by the HEARTH Act)

Policies and Procedures for Rental Assistance

After eligibility has been determined rental assistance can be provided.

A copy of the unsigned lease is required. This lease must be between the customer (tenant) and landlord.

ESG can provide short term assistance for up to 2 months. In addition, payment of up to 2 months of rental arrears and late fees associated with the two month arrears may be provided. ESG will provide financial assistance for rental application fees and/or security deposits equal to no more than 2 months' rent, and last month rent if necessary to obtain housing- provided it does not exceed one month's rent.

Utility deposits required by the utility company for gas, electric, water and sewage are eligible. To rapidly rehouse an individual/household into a unit whereby a previous bill and disconnect is preventing connection to the new unit, arrearages may be paid. Reconnect fees may not be paid.

Additional eligible costs may include moving costs such as truck rental or hiring a moving company, and temporary storage fees not exceeding 3 months.

The ESG program may provide a maximum of no more than \$2,500 per client in program assistance per program year for rent arrears, utility assistance and/or rental assistance or deposits. If it is determined that a client needs additional assistance that would exceed the maximum, the ECOH Executive Director has the discretion to approve additional assistance on a case by case basis in order to keep clients stably housed and prevent homelessness or to provide stable housing for a homeless person or family. However, no client will receive more than 6 months of assistance with ESG Program funds. Any exceptions will be documented in the file.

Units must be inspected prior to issuance of assistance. Units must pass HUD's Minimum Standards for Habitability for Permanent Housing as well as a Lead Based Paint Visual Assessment. Forms are to be placed in the client files.

A Rent Reasonableness form must be completed to insure the unit does not exceed *both* the FMR and Rent Reasonableness standard for similar size units.

#### Policy and Procedures for Case Management and Follow-up

Case managers meet with the clients prior to any assistance provided. Clients are required to take a money management course prior to receiving services and if receiving utility assistance (and have the necessary technology) download a Gulf Power app for monitoring electrical costs.

Clients develop a budget plan and case managers establish a calendar for follow up. Clients are contacted 30, 60 and 90 days after receiving services.

If clients receive continued rental services (i.e. rent payments) they are required to notify us of any change in income or household status immediately and are reassessed at that time. In all cases, the client is reassessed for income eligibility every 90 days.

#### Policy and Procedures for HMIS Participation

**POLICY:** Participation in HMIS is a requirement of any service provider receiving funding from or through ECOH, to insure data collection, tracking of services and documentation of outcomes.

PROCEDURES:

1. For New Providers: Registration, payment of membership and licensing fees, training, access to HMIS
2. For Existing Providers: Renewal of membership and licensing and remain compliant with HUD data quality standards.
3. For All Providers:
  - a. Complete HMIS intake data for all clients served and update and maintain the information on referrals and services provided until client exits program
  - b. Maintain documentation of persons and families seeking assistance, even if determined to be ineligible
  - c. Follow confidentiality of information process for the maintenance of all records containing personally identifying information (this includes confidential intake, data entry completed by personnel that has been trained, the computer used for data entry meets the HUD/HMIS confidentiality requirements, and hard copies of all records have limited access and kept for a minimum of five (5) years.)

Policy and Procedures for Coordination of Mainstream Benefits/Coordinated Assessment

POLICY: Coordination among emergency shelter service providers, essential service providers, homeless prevention and rapid rehousing assistance providers and mainstream service providers is a requirement of any service provider receiving funding from or passed through the ECOH to insure minimum client disruption and maximum client service.

Connections with other resources consist of assisting each client to obtain if applicable:

- Permanent housing
- Medical health treatment
- Behavioral health services
- Veterans Benefits
- Counseling
- Supervision
- Other services needed for independent living
- Medicaid/Medicare
- Food stability programs:
  - Supplemental Nutrition Assistance Program
  - Women Infants and Children
- Supplemental Security Income/Social Security Disability Insurance

PROCEDURES:

1. Participation in HMIS and documentation of referrals
2. Membership in and communications with ECOH and area service providers

**Policies and Procedures Regarding Prevention/At Risk of Homelessness Services for individuals and Families**

Activity Objective:

- To prevent families residing in permanent housing who are imminently at-risk of becoming literally homeless from becoming homeless BUT FOR the ESG assistance.

## Individual and Family (Client) Eligibility

### FOR HOMELESS PREVENTION:

- ESG Funded programs –
  - Income at or below 30% of Area Median, AND
  - meeting either Category 2,3 or 4 definition of homelessness
- Category 2 - Individual or family who will imminently lose their primary nighttime residence provided that:
  1. Residence will be lost within 14 days of the date of application for homeless assistance AND
  2. No subsequent residence has been identified; AND
  3. 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:
  1. Are defined as homeless under the other listed federal statutes
  2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application
  3. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; AND
  4. 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:
  1. Is fleeing or is attempting to flee domestic violence
  2. Has no other residence AND
  3. Lacks the resources or support networks to obtain other permanent housing

### Documentation of Eligibility

- Income verification meeting HUD requirements AND
- For clients meeting Category 2 definitions
  1. Eviction notice – Families are considered homeless if they are within 14 days of the eviction, or
  2. If there is no formal eviction process – a self-declaration from the client explaining the circumstances and any supporting documentation
  3. If the person is staying with family or friend and can no longer reside at that address – a letter from the family or friend stating they can no longer live in their home along with contact information for verification (address and phone number)
  4. If the person is leaving an institution after a short term stay (less than 90 consecutive days) who previously resided on the street or in an emergency shelter – Verification from the institutions staff that the participant has been residing in the institution for less than 90 days and can verify the person is homeless and provide information on their previous living situation and documentation and verification of efforts to confirm that these circumstances are true
- For clients meeting Category 3 and Category 4 definitions:
  1. Third party documentation through an organization or outreach worker who has assisted the individual or family in the past or is currently assisting them, and how long they have been homeless, signed and dated.

2. Certification form signed by individual requesting shelter.

#### Policies and Procedures for Targeting and Providing Essential Services

POLICY: For those families or individuals seeking help for Homeless Prevention and meeting eligibility criteria priorities will be those:

1. Housing loss within 14 days
2. Living in a hotel or motel not paid for by a charitable organization or by Federal, State, or local government programs
3. Living with friends or family, on a temporary basis
4. Being discharged from an institution and reintegrating into the community without a stable housing plan
5. History of homelessness as an adult, prior to any homeless episode occurring in the past 60 days
6. At least one dependent child
7. Applied for shelter or spent at least one night during the past 60 days literally homeless
8. Had a Sudden or significant loss of income in the past 90 days
9. Have Rental and/or utility arrears
10. Other Adult/ Legal Dependent
11. Has moved because of economic factors two or more times in the past 60 days

#### Policies and Procedures for Rental Assistance

After eligibility has been determined rental assistance can be provided. Rental assistance payments can be provided for amounts that are currently due or are in arrears, and for the payment of penalties or fees incurred by the participant and required to be paid under an existing lease or court order.

A copy of the lease is placed in the case file. This lease must be between the customer (tenant) and landlord.

ESG can provide short term assistance for up to 2 months. In addition, payment of up to 2 months of rental arrears and late fees associated with the two month arrears may be provided. ESG will provide financial assistance for rental application fees and/or security deposits equal to no more than 2 months' rent, and last month rent if necessary to obtain housing- provided it does not exceed one month's rent.

Utility deposits required by the utility company for gas, electric, water and sewage and up to 2 months of utility bills in arrears are eligible. Reconnect fees are not eligible.

Additional eligible costs may include moving costs such as truck rental or hiring a moving company, and temporary storage fees not exceeding 3 months.

The ESG program may provide a maximum of no more than \$2,500 per client in program assistance per program year for rent arrears, utility assistance and/or rental assistance or deposits. If it is determined that a client needs additional assistance that would exceed the maximum, the ECOH Executive Director has the discretion to approve additional assistance on a case by case basis in order to keep clients stably housed and prevent homelessness or to provide stable housing for a homeless person or family. However, no client will receive more than 6 months of assistance with ESG Program funds. Any exceptions will be documented in the file.

Units must be inspected prior to issuance of assistance. Units must pass HUD's Minimum Standards for Habitability for Permanent Housing as well as a Lead Based Paint Visual Assessment. Forms are to be placed in the client files.

A Rent Reasonableness form must be completed to insure the unit does not exceed both the FMR and Rent Reasonableness standard for similar size units.

#### Policy and Procedures for Case Management and Follow-up

Case managers meet with the clients prior to any assistance provided. Clients are required to take a money management course prior to receiving services and if receiving utility assistance (and have the necessary technology) download a Gulf Power app for monitoring electrical costs.

Clients develop a budget plan and case managers establish a calendar for follow up. Clients are contacted 30, 60 and 90 days after receiving services.

If clients receive continued rental services (i.e. rent payments) they are required to notify us of any change in income or household status immediately and are reassessed at that time. In all cases, the client is reassessed for income eligibility every 90 days.

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- Permanent housing
- Medical health treatment
- Behavioral health services
- Veterans Benefits
- Counseling
- Supervision
- Other services needed for independent living
- Medicaid/Medicare
- Food stability programs:
  - Supplemental Nutrition Assistance Program
  - Women Infants and Children
- Supplemental Security Income/Social Security Disability Insurance

PROCEDURES:

1. Participation in HMIS and documentation of referrals
2. Membership in and communications with ECOH and area service providers

### **Policies and Procedures Regarding Permanent Supportive Housing**

Activity Objective: In accordance with CPD 14-012, this objective is to ensure that homeless individuals and families with the most severe service needs are prioritized in Permanent Supportive Housing (PSH).

Individual and Family (Client) eligibly:

Meet the definition of Chronically Homeless:

1. A "homeless individual with a disability" who: Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter AND has been homeless continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions total at least 12 months (occasions separated by a break of at least 7 nights) OR
2. An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in #1 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 of 1 or 2, including a family whose composition has fluctuated while the head of household has been homeless.

Policies and Procedures for Prioritization of PSH Beds for Persons experiencing Chronic Homelessness:

A. FOR CoC PROGRAM FUNDED PSH THAT IS DEDICATED OR PRIORITIZED FOR PERSONS EXPERIENCING CHRONIC HOMELESSNESS:

**First Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs that meet BOTH of the following:**

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and



2. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section I.D.3. of this Notice for definition of severe service needs).

**Second Priority - Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs that meet BOTH of the following:**

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
2. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

**Third Priority—Chronically Homeless Individuals and Families with the Most Severe Service Needs. A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom BOTH of the following are true:**

1. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and,
2. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

**Fourth Priority—All Other Chronically Homeless Individuals and Families. A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:**

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is **less than** 12 months; and
2. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

NOTE: Some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant where there are persons who meet a higher priority within the CoC and who have not yet accepted the PSH opportunities offered to them.

**B. FOR CoC FUNDED PROGRAM FUNDED PSH THAT IS NON-DEDICATED AND NON-PRIORITIZED PSH BEDS**

Recipients of non-dedicated and non-prioritized PSH are encouraged to offer housing to chronically homeless individuals and families first. At a minimum, non-dedicated and non-prioritized PSH are required to place otherwise eligible households in an order that prioritizes in a nondiscriminatory manner those who would benefit the most from this type of housing beginning with those most at risk of becoming chronically homeless. For eligibility in non-

dedicated and non-prioritized PSH serving non-chronically homeless households, any household member with a disability may qualify the family for PSH.

**(a) First Priority–Homeless Individuals and Families with a Disability with the Most Severe Service Needs.**

An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for any period of time, including persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution **and** has been identified as having the most severe service needs.

**(b) Second Priority–Homeless Individuals and Families with a Disability with a Long Period of Continuous or Episodic Homelessness.** An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and had been living or residing in one of those locations for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months

**Third Priority–Homeless Individuals and Families with Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters.** An individual or family that is eligible for CoC Program-funded PSH who has been living in a place not meant for human habitation, a safe haven, or an emergency shelter. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution.

**d) Fourth Priority–Homeless Individuals and Families with a Disability Coming from Transitional Housing.** An individual or family that is eligible for CoC Program-funded PSH who is coming from transitional housing, where prior to residing in the transitional housing lived on streets or in an emergency shelter, or safe haven. This priority also includes homeless individuals and homeless households with children with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and are living in transitional housing—all are eligible for PSH even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing.

Recipients of CoC Program funded PSH should follow the priority above while also considering the goals and any identified target populations served by the project.