

INDIANAPOLIS COC WRITTEN STANDARDS

AUGUST 1, 2016

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A. Introduction

The CoC Program interim rule¹ requires CoCs to establish and consistently follow written standards for providing CoC assistance, in consultation with recipients of the Emergency Solutions Grant program. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance in the CoC Program
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive assistance for permanent supportive housing assistance, transitional housing assistance, and rapid re-housing assistance
- Standards for determining what percentage or amount of rent each participant must pay while receiving Rapid-Rehousing assistance

The goals of the written standards are to:

- Establish community-wide expectations on the operations of projects within the community
- Ensure that the system is transparent to users and operators
- Establish a minimum set of standards and expectations in terms of the quality expected of projects
- Make local priorities transparent to recipients and subrecipients of funds
- Create consistency and coordination between recipients' and subrecipients' projects within the Indianapolis CoC

This document outlines the Indianapolis CoC's Written Standards which meet HUD's minimum requirements and address CoC expectations for all projects. For each project type, the standards outline the purpose of the project type, eligibility criteria, prioritization, minimum standards of assistance, client access, and performance standards.

All recipients or subrecipients of CoC Program funding must follow these standards and the standards must be applied consistently across the entire CoC's defined geographic area. The CoC strongly encourages projects that do not receive CoC funds to accept and utilize these written standards. Recipients and subrecipients of CoC and local funds may develop additional standards for administering program assistance, but these additional standards cannot be in conflict with those established by the Indianapolis CoC or the CoC Program interim rule.

The Written Standards have been implemented in alignment with the CoC's PSH Policies and other existing policies and procedures for Coordinated Entry.

B. Standards for All Project Types

As indicated in our Blueprint 2.0, the Indianapolis CoC is committed to ensuring homelessness is rare, short-lived and recoverable. As part of this effort, the CoC is focused on improving access to and

¹ US Department of Housing and Urban Development. (2012). *Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program*. (HUD 24 CFR Part 578 [Docket No. FR-5476-I-01] RIN 2506-AC29). Washington, DC. Retrieved from https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

coordination of housing services and enhancing services for highly vulnerable populations to include Chronically Homeless, Veterans, Victims of Domestic Violence, and Unaccompanied Youth. The following standards are applicable to all project types and will promote better access and outcomes within our system.

1. Housing First

- *Housing First* is a programmatic and systems approach that centers on providing people who are homeless with housing quickly and then providing services as needed.
- Housing is not contingent on compliance with services. Supportive services are voluntary, but can and should be used to persistently engage participants to ensure housing stability.
- Participants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction.
- Services are provided post-housing to promote housing stability and well-being.
- All programs are expected to ensure low barriers to program entry for program participants and there should be few to no programmatic prerequisites to permanent housing entry. As such, projects must allow entry to program participants regardless of their income, current or past substance use, criminal records, or history of domestic violence.
- The CoC will authorize limited exceptions for projects in the adoption of a housing first model where it conflicts with funder requirements or local/state law (e.g., restrictions on serving people who are listed on sex offender registries).

2. Equal Access & Non-discrimination

- Providers must have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless system.
- Providers must comply with all federal statutes and rules including the Fair Housing Act², the Americans with Disabilities Act³, and Equal Access to Housing Final Rule⁴.
- The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household.
- Projects that serve families with children must serve **all types of families with children**; if a project targets a specific population (e.g., women with children), these projects must serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults that reside together.
- The age and gender of a child under 18 must not be used as a basis for denying any family's admission to a project.
- The Indianapolis CoC practices a person-centered model that strongly incorporates participant choice and inclusion of subpopulations present in Indianapolis including, but not limited to,

² United States Department of Justice. The Fair Housing Act. Accessed May 2015.

<http://www.justice.gov/crt/about/hce/title8.php>.

³ US Department of Housing and Urban Development. Section 504 of the Rehabilitation Act of 1973. Accessed May 2015.

<http://portal.hud.gov/hudportal/HUD?src=/programdescription/sec504>.

⁴ <https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>

chronically homeless, homeless veterans, youth, families with children, and victims of domestic violence.

3. Coordinated Entry Participation

- All CoC-funded and ESG-funded projects are required to participate in the CoC's Coordinated Entry System
- Participation requires following all established procedures and the use of the Coordinated Entry Assessment Tool and Vulnerability Index (VI).
- Projects should refer to the CoC's PSH Policies and Coordinated Entry Housing Application Instructions for additional information.

4. HMIS Participation

- All CoC-funded and ESG-funded projects are required to participate in Client Track, the CoC's Homeless Management Information System (HMIS).
- The CoC actively encourages non-CoC/ESG providers to participate in Client Track.

5. Access to Mainstream Resources

- The CoC expects that every agency that is funded through the CoC or ESG programs will coordinate with and access mainstream and other targeted homeless resources.
- Providers should assess and assist participants with obtaining any mainstream resource for which they may be eligible for including: TANF, Veterans Health Care, Food Stamps, Medicaid, CHIP, SSI/SSDI, Workforce Investment funds, Welfare-to-Work, Substance Abuse Block Grant programs, and Social Service Block Grant programs.
- Where possible, providers should streamline processes applying for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step.

6. Educational Liaison

- For projects that serve households with children, a staff person must be designated as the educational liaison that will ensure children are:
 - Enrolled in school
 - Connected to appropriate services in the community, including early childhood projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services

7. Termination & Grievance Procedures

- Providers must have a written termination policy outlining program rules and termination processes including a formal due process
- This process, at a minimum, must consist of:
 - (1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (2) Written notice to the program participant containing a clear statement of the reasons for termination;

- (3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- (4) Prompt written notice of the final decision to the program participant.

C. Permanent Supportive Housing: Eligibility and Prioritization

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

8. Eligibility Criteria

- Households must meet the HUD definition of homelessness
- One adult or child member of the household must have a disability
- Must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement (e.g. Projects originally funded under the Samaritan Housing Initiative must continue to serve chronically homeless individuals and families; projects funded under the Permanent Supportive Housing Bonus must continue to serve the homeless population outlined in the NOFA under which the project was originally awarded).
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.

9. Prioritizing Eligible Households⁵

The CoC has adopted the orders of priority for PSH as established in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.⁶ As such, all PSH eligible households will be prioritized as follows:

Dedicated/Prioritized CoC PSH

1. Chronically Homeless Individuals and Families⁷ with the Longest History of Homelessness and with the Most Severe Service Needs.
 2. Chronically Homeless Individuals and Families with the Longest History of Homelessness.
 3. Chronically Homeless Individuals and Families with the Most Severe Service Needs.
 4. Other Chronically Homeless Individuals and Families.
- In instances where two or more households have equal priority, applicants will be further prioritized as follows:
 - Veterans (with any discharge status)
 - Youth (18 – 24 years of age)
 - The most severe service needs will be determined by the household's VI score

Non-Dedicated/Prioritized CoC PSH

1. Homeless Individuals and Families with a Disability with the Most Severe Service Needs.

⁵ Projects with a population specific focus should follow this order of priority within the population they serve

⁶ <https://www.hudexchange.info/resource/3897/notice-cpd-14-012-prioritizing-persons-experiencing-chronic-homelessness-in-psh-and-recordkeeping-requirements/>

⁷ <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>

2. Homeless Individuals and Families with a Disability with a Long Period of Continuous or Episodic Homelessness.
 3. Homeless Individuals and Families with Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters.
 4. Homeless Individuals and Families with a Disability Coming from Transitional Housing where prior to residing in the transitional housing lived on streets or in an emergency shelter, or safe haven.
- In instances where two or more households have equal priority, applicants will be further prioritized as follows:
 - Veterans (with any discharge status)
 - Youth (18 – 24 years of age)
 - The most severe service needs will be determined by the household’s VI score

10. Minimum Standards of Assistance

- There can be no predetermined length of stay for a PSH project
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of stay in PSH
- Project participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.
- Recipients and subrecipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant’s assistance is terminated only in the most severe cases.

11. Current Performance Indicators⁸

- 92% or more of all participants will remain stable in PSH or exit to other permanent housing destinations
- 78% or more of adult participants will have mainstream (non-cash) benefits
- 48% or more of adult participants will have income from sources other than employment
- 31% or more of adult participants will increase income from sources other than employment
- 9% or more of adult participants will have income from employment
- 59% or more of adult participants will increase income from employment

D. Rapid Re-Housing Programs: Eligibility and Prioritization

Rapid Re-Housing is available to help those who are 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

12. Eligibility Criteria

- Households must meet the HUD definition of homelessness

⁸ Performance Indicators represent current 2016 data. The CoC is in the process of creating standard outcome goals.

- Must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement (e.g. in the FY13/14 NOFA, new RRH projects could only serve families with children coming directly from streets or shelter)
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.

13. Prioritizing Eligible Households for Rapid Re-Housing Programs⁹

Eligible participants are referred to the rapid re-housing program which they are eligible and prioritized based the following prioritization:

1. Chronically Homeless Households¹⁰
 2. Households with the longest history of homelessness
 3. Households with the most severe service needs
- In instances where two or more households have equal priority, applicants will be further prioritized as follows:
 - Veterans (with any discharge status)
 - Youth (18 – 24 years of age)
 - The most severe service needs will be determined by the household’s VI score

14. Rent Limits for Rapid Re-Housing Programs

- Recipients may set their own parameters for the total amount of assistance provided including:
 - May set a maximum amount program participant may receive (e.g. \$8,000/year)
 - May set a maximum number of months that a program participant may receive rental assistance (e.g. no more than 6 months of rental assistance)
 - May set a maximum number of times that a program participant may receive rental assistance (e.g. no more than 12 times within 2 years)
- Recipients may require a program participant to pay rent. However, it is suggested that the tenant share not exceed 40% of the household’s adjusted monthly income.

15. Minimum Standards for Rapid Re-Housing Programs

The following minimum standards will be applied to all rapid re-housing programs:

- Maximum participation in a rapid re-housing program cannot exceed 24 months.
- Support services must be provided throughout the duration of stay in housing.
- Require Program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability.
- Program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

⁹ Projects with a population specific focus should follow this order of priority within the population they serve

¹⁰ Chronically Homeless Households maintain their chronic status in RRH and therefore this assistance can be used as bridge housing once PSH is available if determined a more appropriate intervention

- Must re-evaluate at least annually that the program participant lacks sufficient resources and support networks necessary to retain housing without assistance

16. Current Performance Indicators¹¹

- 36% or more of households served will be placed in permanent housing within 60 days.
- 84% or more of households served will maintain permanent housing for 180 days after discharge.
- 90% or more of all participants remain stable in RRH or exit to other permanent housing destinations
- 68% or more of adult participants will have mainstream (non-cash) benefits
- 46% or more of adult participants will have income from sources other than employment
- 5% or more of adult participants will increase income from sources other than employment
- 19% or more of adult participants will have income from employment
- 12% or more of adult participants will increase income from employment

E. Transitional Housing: Eligibility and Prioritization

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

17. Eligibility Criteria

- Households must meet the HUD definition of homelessness
- Must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement (e.g. households fleeing domestic violence)
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.

18. Prioritizing Eligible Households for Transitional Housing Programs¹²

Eligible participants are referred to the Transitional Housing program for which they are eligible and prioritized based the following prioritization:

1. Households with the most severe service needs not eligible for PSH
2. Households with the longest histories of homelessness

- In instances where two or more households have equal priority, applicants will be further prioritized as follows:
 - Veterans (with any discharge status)
 - Youth (18 – 24 years of age)
- The most severe service needs will be determined by the household's VI score
- Recipients must inform any Chronically Homeless households being referred to TH that by entering the transitional housing project they will not be eligible for permanent supportive housing projects dedicated to serving chronically homeless

19. Minimum Standards for Transitional Housing Programs

All referrals to transitional housing and assessment for type and level of services must come through the coordinated entry system. The following minimum standards will be applied to all transitional housing programs:

¹¹ Performance Indicators represent current 2016 data. The CoC is in the process of creating standard outcome goals.

¹² Projects with a population specific focus should follow this order of priority within the population they serve

- 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. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

20. Current Performance Indicators¹³

- 60% or more of all participants will exit to permanent housing destinations
- 82% or more of adult participants will have mainstream (non-cash) benefits
- 47% or more of adult participants will have income from sources other than employment
- 18% or more of adult participants will increase income from sources other than employment
- 30% or more of adult participants will have income from employment
- 26% or more of adult participants will increase income from employment

¹³ Performance Indicators represent current 2016 data. The CoC is in the process of creating standard outcome goals.

F. Appendix I: HUD Definitions

21. Chronically Homeless¹⁴

Chronically homeless means: (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: (i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) 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.

22. Homeless Individual with a Disability¹⁵

The term ‘homeless individual with a disability’ means an individual who is homeless, as defined in section 103, and has a disability that— (i)(I) is expected to be long-continuing or of indefinite duration; (II) substantially impedes the individual’s ability to live independently; (III) could be improved by the provision of more suitable housing conditions; and (IV) is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury; (ii) is a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or (iii) is the disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

¹⁴ <https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

¹⁵ US Department of Housing and Urban Development. Federal Register. Vol. 76, No. 233. Accessed May 2015. https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf