



INDIANAPOLIS WRITTEN
STANDARDS FOR
HOMELESSNESS ASSISTANCE &
SERVICES



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Introduction

The Indianapolis Continuum of Care (CoC) in coordination with the City of Indianapolis and homeless service funders have developed the written standards contained here for providing housing and services to those persons experiencing homelessness or at-risk of homelessness across Indianapolis. 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 the minimum requirements of the Department of Housing and Urban Development (HUD) and address community expectations for all projects serving persons who are homeless or at-risk of homelessness. 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 funding through the CoC Program, Emergency Solutions Grant (ESG) Program, Housing Trust Fund (HTF), Supportive Services for Veteran Families (SSVF) and Grant and Per Diem (GPD) programs 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 these funds to accept and utilize these written standards. Recipients and subrecipients of the funds above may develop additional standards for administering program assistance, but these additional standards cannot be in conflict with those established by the Indianapolis CoC.

The Written Standards have been implemented in alignment with the policies and procedures for Coordinated Entry.

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

1. Housing First

- *Housing First* is a programmatic and systems approach that centers on quickly providing people who are homeless with housing 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 (except in RRH where participation in case management is required).
- 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 homelessness assistance system.
- Providers must comply with all federal statutes and rules including, but not limited to, the Fair Housing Act¹, the Americans with Disabilities Act², and Equal Access to Housing Final Rule³.
- 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, chronically homeless, homeless veterans, youth, families with children, and survivors of domestic violence.

3. Coordinated Entry Participation

- All CoC-funded, ESG-funded, and SSVF-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 (Vulnerability Index–Service Prioritization Decision Assessment Tool (VI-SPDAT)).
- Projects should refer to the CoC's Coordinated Entry Policies and Procedures for additional information (indycoc.org).

4. HMIS Participation

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

¹ United States Department of Justice. The Fair Housing Act. Accessed May 2015.
<http://www.justice.gov/crt/about/hce/title8.php>.

² 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>.

³ <https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>

5. Access to Mainstream Resources

- The CoC expects that every agency that is funded through the CoC Program, ESG Program or SSVF Program 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, SOAR, 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

- Providers are expected to designate a staff person to ensure that children are:
 - Enrolled in school
 - Connected to appropriate services in the community, including early childhood projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and the McKinney Vento education services
- Staff persons who are designated in this role may carry out multiple duties within their organization in addition to their role as an educational liaison. Providers may also partner with another agency/individual to ensure that children are receiving educational services so long as the provider has a staff member who is responsible for ensuring the services are being accessed.

7. Termination & Grievance Procedures

- Providers must have a written termination policy outlining program rules and termination processes including a formal due process. Note that any CoC funded PSH projects must consult with the Housing Committee before they terminate a client.
- This process, at a minimum, must consist of:
 - (1) Providing the program participant with a written copy and verbal explanation of the program rules and the termination process before the participant begins to receive assistance;
 - (2) Written notice and verbal explanation 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 and verbal notice of the final decision to the program participant.

8. Recordkeeping Requirements

- Participant records containing personally identifying information must be kept secure and confidential.
- Participant Recordkeeping Requirements shall include:
 - A written confidentiality/privacy notice, a copy of which should be made available to participants if requested
 - Documentation of homelessness (following HUDs guidelines)
 - A record of services and assistance provided to each participant
 - Documentation of any applicable requirements for providing services/assistance
 - Documentation of use of coordinated assessment system
 - Documentation of use of HMIS
 - Records must be retained for the appropriate amount of time as prescribed by HUD
- Financial Recordkeeping Requirements shall include:
 - Documentation for all costs charged to the grant
 - Documentation that funds were spent on allowable costs

- Documentation of the receipt and use of program income
- Documentation of compliance with expenditure limits and deadlines
- Retain copies of all procurement contracts as applicable
- Documentation of amount, source and use of resources for each match contribution

Street Outreach

Street Outreach (SO) is designed to increase access and connection to services for people who are living unsheltered on the streets including the provision of urgent, non-facility based care to people who are unsheltered who are unwilling to or unable to access emergency shelter, housing, or an appropriate health facility.

9. Eligibility/Targeting Criteria

- Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is 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 or train station, airport, or camping ground.

10. Minimum Standards for Outreach Programs

- Providers will follow the Professional Blended Street Outreach Standards when out in the field- see indycoc.org for more information.
- Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered the following Street Outreach services, as needed and appropriate:
 - Engagement (proactive activities to find and engage persons experiencing homelessness)
 - Provision of basic survival items (blankets, gloves, socks, personal care items, etc)
 - Case Management including assistance with navigating service delivery system and assistance with obtaining housing
 - Provision or connection to appropriate emergency and mental health services
 - Transportation of unsheltered people to emergency shelters or other service facilities
- When appropriate based on the individual's needs and wishes, outreach workers will refer individuals to emergency shelter. However, the provision of or referral to rapid rehousing or other permanent housing solution should be prioritized over emergency shelter or transitional housing
- If a household with a child under the age of 18 are found during outreach activities, the state of Indiana requires outreach workers to contact Department of Child Services. Outreach workers should take the necessary steps to assure safety as outlined in the Professional Blended Street Outreach Standards.

Emergency Shelter

Emergency shelter (ES) provides safe, basic lodging where individuals and families can stay temporarily while they resolve their housing crisis.

11. Eligibility Criteria

- Providers of emergency shelter will admit individuals and families who meet the HUD definition of homeless (see Appendix A) and agency's eligibility criteria.

12. Prioritizing/Targeting Eligible Households for Emergency Shelter

- When appropriate based on the individual's needs and wishes, the provision of or referral to Homeless diversion, Prevention or Rapid Re-Housing services, or other available housing programs offered through the Continuum of Care that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter services.

13. Assessment

- Emergency shelter providers will offer individuals and families an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered emergency shelter services, as needed, available, and appropriate. Once admitted, providers must also reassess emergency shelter participants, on an ongoing basis, to determine the earliest possible time that they can be discharged to permanent housing.

14. Length of Stay/Discharge

- Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. The length of stay is generally expected to be less than 30 days.
- Providers should make every effort to ensure program participants are discharged from Emergency Shelter **only** when they choose to leave or when they have successfully obtained safe, permanent housing.
- Individual service provider's policies will determine any length of stay limitations, which will be clearly communicated to program participants at program entry.
- Termination should only occur in the most severe of cases. Keep in mind, termination from emergency shelter means that a person may sleep unsheltered.

15. Safety and Shelter Needs of Special Populations

- Safety and shelter safeguards shall be determined by the individual service provider's policies and clearly communicated to program participants.

16. Performance Outcomes

- On average, persons will exit within 45 days of entry.
- No more than 20% of those who have exited will return to homelessness.
- Entry of those who are homeless for the first time will decrease by 5% from prior year.
- 45% of those served will exit to permanent housing destination.

Diversion

Diversion is housing relocation and stabilization services, mediation and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter, transitional housing or place not meant for human habitation.

17. Eligibility Criteria

- Individuals and families who will be homeless if they do not receive diversion assistance to prevent them from sleeping at shelter or in an unsheltered location.

18. Prioritizing/Targeting Eligible Households

- Providers of Diversion Funds are able to set their own policies regarding prioritization and targeting of households so long as the policies are outlined in a written document(s) and do not conflict with any part of the Written Standards.

19. Minimum Standards for Diversion

- Must use assessment tool to determine imminent risk of person's needing to sleep at shelter or unsheltered location.
- Provider must have staff available to assist household the day they present.
- Diversion staff must be highly skilled in areas of mediation, negotiation, assessment, advocacy, and strength based case management.
- Provider must offer flexible resources including financial assistance to assist persons to safely stabilize.
- Length of assistance can vary from one-time "light touch" to more extensive support.

Prevention

Prevention funds are designed to prevent an individual or family from moving into an emergency shelter or living in a public or private place not meant for human through housing relocation and stabilization services and short- and/or medium-term rental assistance

20. Eligibility Criteria

- Households must be at-risk of homelessness and meet the eligibility requirements of the program under which the project is funded including any applicable income limits (ESG, SSVF, etc).

21. Prioritizing/Targeting Eligible Households

- Providers of Prevention Funds are able to set their own policies regarding prioritization and targeting of households so long as the policies are outlined in a written document(s) and do not conflict with any part of the Written Standards.

22. Minimum Standards for Prevention

- Providers must follow all requirements and financial limits established in the program under which the project is funded (ESG, SSVF, etc).

Permanent Supportive Housing

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.

23. 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 (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) and the current grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.

24. Prioritizing Eligible Households⁴

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.⁵ As such, all PSH eligible households will be prioritized as follows:

Dedicated/Prioritized CoC PSH

- Chronically Homeless Individuals and Families⁶ with the Longest History of Homelessness and with the Most Severe Service Needs.
- In instances where two or more households have equal priority, applicants will be further prioritized as follows:
 - Veterans Not Eligible for Housing/Health VA Services

⁴ Projects with a population specific focus should follow this order of priority within the population they serve. See Appendix B for example.

⁵ <https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

⁶ <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>

- Survivors of Domestic Violence
 - Youth (18 – 24 years of age)
- The most severe service needs will be determined by the household’s VI-SPDAT score
- If there are no persons within the CoC’s geographic area that meet the definition of chronically homeless, recipients of dedicated and prioritized CoC Program-funded PSH may serve households that are not experiencing chronic homelessness and in the order of priority described below for non-dedicated and not-prioritized PSH beds. Should the bed turnover and become vacant again, the recipient must start by first seeking households that meet Order of Priority for dedicated and prioritized CoC Program-funded PSH.

Non-Dedicated/Prioritized CoC PSH

1. Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs⁷
 2. Homeless Individuals and Families with a Disability with Severe Service Needs⁸.
 3. Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.⁹
 4. 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 currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven¹⁰.
- In instances where two or more households have equal priority, applicants will be further prioritized as follows:
 - Veterans Not Eligible for Housing/Health VA Services
 - Survivors of Domestic Violence
 - Youth (18 – 24 years of age)
 - The most severe service needs will be determined by the household’s VI-SPDAT score¹¹
 - **Note:** The Coordinated Entry policies and Procedures will define how the prioritization will be implemented

25. Minimum Standards of Assistance

- There can be no predetermined length of stay for a PSH project

⁷ An individual or family that is eligible for CoC Program-funded PSH 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.

⁸ An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required

⁹ An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

¹⁰ This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

¹¹ HUD funded Veterans Affairs Supportive Housing (HUD-VASH) may use it’s program specific assessment tool to determine priority.

- 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
- The program participant must be the tenant on the lease (or sublease) for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminated only for cause
- 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. All terminations must be reviewed by the Housing Committee.

26. Performance Outcomes

- 95% or more of all participants will remain stable in PSH or exit to other permanent housing destinations
- No more than 5% of those exited to other permanent housing destination return to homelessness within 2 years of exit
- 100% of adult participants will have mainstream (non-cash) benefits
- 55% or more of adult participants will have income from sources other than employment
- 30% or more of adult participants will have income from employment

Rapid Re-Housing Programs

Rapid Re-Housing (RRH) is available to help those who are homeless be quickly and permanently housed. Rapid Re-Housing Projects 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

27. Eligibility Criteria for RRH

- **CoC Program RRH**
 - 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. 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.
- **ESG Program RRH**
 - Households must meet Category 1 or Category 4 the HUD definition of homelessness.
 - There is no income requirement for initial eligibility
 - For participants receiving assistance past 12 months, the household annual income must be less than or equal to 30% area median income (AMI) at the time of the annual re-evaluation
- **SSVF Program RRH**
 - Households must be a "Veteran family"
 - Households must be "Very low-income" (income does not exceed 50% of area median income).
 - Household must be literally homeless, and at risk to remain in this situation but for grantee's assistance.

28. Prioritizing Eligible Households for Re-Housing Programs¹²

A. CoC & ESG Program RRH

¹² Projects with a population specific focus should follow this order of priority within the population they serve. See Appendix B for example.

- Eligible participants are referred to the rapid re-housing program for which they are eligible and prioritized based the following prioritization:
 1. Chronically Homeless individuals and families with the Longest History of Homelessness and with the Most Severe Service Needs¹³
 2. Non-Chronically Homeless individuals and families with the Longest History of Homelessness and with the Most Severe Service Needs
- In instances where two or more households have equal priority, applicants will be further prioritized as follows:
 - Veterans Not Eligible for Housing/Health VA Services
 - Survivors of Domestic Violence
 - Youth (18 – 24 years of age)
- The most severe service needs will be determined by the household’s VI-SPDAT score
- Projects that planned to target non-chronic households may request a waiver to the above prioritization to be granted on a case-by-case basis by the Indianapolis Blueprint Council. Such waiver may be time-limited. The process for requesting a waiver is outlined in the Coordinated Entry Policies and Procedures document.
- **Note:** Households will be prioritized within the recommended VI-SPDAT score of 4 to 7 unless there are households higher on the prioritization list that specifically requested Rapid Re-housing. The prioritization process must take into account client choice. Prior to Rapid Re-housing being used as a Bridge to PSH the Coordinated Entry System Lead and associated case workers must develop a plan based on the Bridge section of the Coordinated Entry Policies & Procedures to ensure that the projects are resourced to successfully bridge the household into PSH.
- B. SSVF RRH**
 - Eligible participants will be prioritized or targeted based on the agreed upon standards set forth in the provider’s SSVF grant agreement.
- **Note:** The Coordinated Entry policies and Procedures will define how the prioritization will be implemented

29. Rent Limits for Rapid Re-Housing Programs

A. CoC and ESG RRH

- 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.

B. SSVF RRH

- Grantees must follow the specific financial assistance limitations outlined in the SSVF Program Guide¹⁴
- Grantees may choose to have participants share in the cost of rent.

30. Minimum Standards for Rapid Re-Housing Programs

A. CoC and ESG RRH

¹³ 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.

¹⁴ https://www.va.gov/HOMELESS/ssvf/docs/SSVF_Program_Guide_May2016.pdf

The following minimum standards will be applied to all CoC & ESG 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.
- Providers develop and maintain strong linkages with community supports/networks.
- The program participant must be the tenant on the lease (or sublease) for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminated only for cause
- 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.
- Must re-evaluate at least annually that the program participant lacks sufficient resources and support networks necessary to retain housing without assistance. **In addition, an ESG-RRH re-evaluation must demonstrate that the household's annual income must be less than or equal to 30 percent of Area Median Income (AMI).**

B. SSVF RRH

- Grantees must follow all limitations on financial assistance according to SSVF Program Guide. All supportive services are allowable as long as Veteran family meets basic income eligibility criteria and would become or remain homeless “but for” the supportive services.
- A written lease is required for on-going financial assistance.
- Grantees must provide ongoing housing-focused case management services.
- Households must be recertified at least once every three months.
- A written lease is required for on-going financial assistance.

31. Performance Outcomes

- 95% of households served will be placed in permanent housing within 40 days
- 85% or more of all participants remain stable in RRH or exit to other permanent housing destinations
- No more than 5% of those exited to other permanent housing destinations return to homelessness within 2 years of exit.
- 100% or more of adult participants will have mainstream (non-cash) benefits
- 55% or more of adult participants will have income from sources other than employment
- 30% or more of adult participants will have income from employment

Transitional Housing

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

32. Eligibility Criteria

A. Non-GPD TH

- Households must meet the HUD definition of homeless
- 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.

B. GPD TH¹⁵

¹⁵ VA will not pay per diem for transitional housing for any homeless Veteran who has had three or more episodes (admission and discharge for each episode) of care without a waiver (see 38 CFR 61.33).

- Households must meet the following criteria: 1) Meet the HUD definition of homeless, 2) Served at least one day of Active Duty, and 3) Have Discharge status other than dishonorable

33. Prioritizing Eligible Households for Transitional Housing Programs¹⁶

A. Non-GPD TH

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 Not Eligible for Housing/Health VA Services
 - Survivors of Domestic Violence
 - Youth (18 – 24 years of age)
 - The most severe service needs will be determined by the household’s VI-SPDAT score
 - Recipients must inform any Chronically Homeless households being referred to non-GPD TH that by entering the transitional housing project they will not be eligible for permanent supportive housing projects dedicated to serving chronically homeless.

B. GPD TH

- Eligible participants will be prioritized or targeted based on the standards set forth in the GPD TH Model being provided as follows:
 - **Bridge Housing Targeted Population** - Homeless Veterans that have been offered and accepted a permanent housing intervention (e.g., SSVF, HUD-VASH, CoC) but are not able to immediately enter the permanent housing.
 - **Low Demand Targeted Population-** 1) Chronically homeless Veterans who suffer from mental health or substance use problems and who struggle with maintaining sobriety
2) Veterans with multiple treatment failures or those that may have never received treatment services, or may have been unsuccessful in traditional housing programs.
 - **Hospital to Housing (Respite Care) Targeted Population** - Homeless Veterans identified and evaluated in emergency departments and inpatient care settings for suitability for direct transfer to a designated GPD Program for transitional housing and supportive care.
 - **Clinical Treatment Targeted Population-** Homeless veterans with a specific diagnosis related to a substance use disorder and/or mental health diagnosis; veteran actively chooses to engage in clinical services.
 - **Service- Intensive Transitional Housing (SITH) Targeted Population-** Homeless veterans who choose a supportive transitional housing environment providing services prior to entering permanent housing.
- Note: The Coordinated Entry policies and Procedures will define how the prioritization will be implemented

¹⁶ Projects with a population specific focus should follow this order of priority within the population they serve. See Appendix B for example.

34. Minimum Standards for Transitional Housing Programs

A. Non-GPD TH

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

- 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 an occupancy agreement, program agreement, lease or housing contract for a term of at least one month. The agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

B. GPD TH

GPD providers must use coordinated entry and update the Veteran Master List. In addition, GPD providers must adhere to the standards required by the VA according to the TH model funded. These include the following:

Bridge Housing:

- Bridge housing is intended to be a short-term stay in transitional housing for Veterans with pre-identified permanent housing interventions.
- Goals in the Individual Service Plan should be very short-term with the focus on the move to permanent housing, rather than the completion of treatment goals
- Veterans are expected to receive case management and support which should be coordinated with the HUD-VASH or SSVF team. Grantees will assist Veterans with accessing services as needed/requested by the Veteran (provide available of a menu of services).
- Length of Stay (LOS) is individually determined based on need but, in general not expected to exceed 90 days.
- Veterans must have been offered and accepted a permanent housing intervention prior to admission or within the first 14 days.

Low Demand:

- Program design should follow a low demand/harm reduction model.
- Program should not require sobriety or compliance with mental health treatment as a condition of admission or continued stay.
- Services must include case management, substance use and mental health treatment, and referrals for benefits.
- Programs must have a resident orientation designed to set the expectations.
- Programs must have 24/7 on site staffing at the same location as the location of the program participant (use of resident managers are not allowed).
- Programs must have a method to monitor comings and goings and a system in place for the management of the introduction of contraband.
- Programs must be willing to retain Veterans who commit minor infractions of rules and who cannot and/or will not stop drinking and/or using.
- Programs must have procedures in place to ensure safety of staff and residents

Hospital to Housing (Respite Care)

- Housing sites are expected to be in close proximity to the referring medical center so that on-going clinical care, including specialty care, can continue to be provided.
- Sites must have a post-discharge care plan that addresses ongoing physical, mental health, substance use disorder and social work needs as well as care management plans

- A Memorandum of Understanding must be in place with the local medical center that details participation in the Hospital-to-Housing program.
- Registration of the program with the national HPACT program office and full participation in program elements.

Clinical Treatment

- Treatment programs must incorporate strategies to increase income and housing attainment services
- Must conduct individualized assessment, services, and treatment plan which are tailored to achieve optimal results in a time efficient manner and are consistent with sound clinical practice;
- Program stays are to be individualized based upon the individual service plan for the veteran (not program driven)
- Staff are to be licensed and/or credentialed for the SUD /MH services provided; and
- Veterans are offered a variety of treatment service modalities (e.g. individual and group counseling/therapy, family support groups/family therapy, psychoeducation).

Service- Intensive Transitional Housing (SITH)

- Scope of services should incorporate tactics to increase the veteran’s income through employment and/or benefits and obtaining permanent housing.
- Services provided and strategies utilized will vary based on the individualized needs of the veteran and resources available in the community.

35. Performance Outcomes

A. Non-GPD TH

- On average, participants will exit within 190 days of entry.
- 75% or more of all participants will exit to permanent housing destinations
- 100% or more of adult participants will have mainstream (non-cash) benefits
- 55% or more of adult participants will have income from sources other than employment
- 30% or more of adult participants will have income from employment

B. GPD TH

The chart below identifies the performance outcomes for each GPD TH Model.

Housing Model	Performance Outcome
Bridge Housing	<ul style="list-style-type: none"> • Discharge to permanent housing is 70%. • Negative Exits target are less than 23%.
Low Demand	<ul style="list-style-type: none"> • Discharge to permanent housing is 50%. • Negative exits less than 23%
Hospital to Housing (Respite Care)	<ul style="list-style-type: none"> • Discharge to permanent housing is 65% • Negative exits less than 23%
Clinical Treatment	<ul style="list-style-type: none"> • Discharge to permanent housing is 65% • Employment of individuals at discharge is 50% • Negative exits less than 23%
Service- Intensive Transitional Housing (SITH)	<ul style="list-style-type: none"> • Discharge to permanent housing is 65% • Employment of individuals at discharge is 50% • Negative exits less than 23%

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Safe Haven

Safe Haven, as defined in the Supportive Housing Program, is a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services.

36. Eligibility Criteria

- Households must meet the HUD definition of homelessness, and be residing on the streets or places not meant for human habitation
- Households must have at least one member with a severe and persistent mental illness
- Programs may establish additional eligibility requirements based on program model (e.g. program enrollment).

37. Prioritizing Eligible Households for Safe Haven Programs¹⁷

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

- Households with the longest length of homelessness and most severe service needs.

38. Minimum Standards for Safe Haven Programs

- Must be located in a facility, meaning structure or structures
- Must allow 24-hour residence
- Must have private or semi-private rooms
- Must provide access to services in a low demand facility, but cannot require program participants to use them

39. Performance Outcomes

- On average, participants will exit within 190 days of entry.
- 75% or more of all participants will exit to permanent housing destinations
- 100% or more of adult participants will have mainstream (non-cash) benefits
- 55% or more of adult participants will have income from sources other than employment
- 30% or more of adult participants will have income from employment

Program Transfers

In specific situations, participants in one type of project may transfer to another project as noted below. The CES policies and procedures further clarify how households are prioritized in transfer situations.

40. PSH to PSH

¹⁷ Projects with a population specific focus should follow this order of priority within the population they serve. See Appendix B for example.

- CoC-funded PSH projects may serve individuals and families from other CoC-funded PSH projects **as long as program participants originally met the eligibility requirements for the PSH project to which they are transferring at the time they entered their initial PSH project**
- **Example 1** : A program participant who originally met the definition of chronically homeless prior to entering the initial PSH program may be served by a PSH project that is dedicated to serving individuals and families experiencing chronic homelessness.
- **Example 2**: A program participant who did not meet the definition of chronically homeless may be served by a PSH project that is not dedicated to serving individuals and families experiencing chronic homelessness.

41. RRH to PSH

- Program participants that are receiving RRH assistance through ESG, CoC, and SSVF, or select other funding sources **maintain their homeless status and chronically homeless status for the purpose of eligibility** for other permanent housing programs, such as HUD-VASH and CoC-funded permanent supportive housing (so long as they meet any other additional eligibility criteria for these programs).
- **Example 1**: A chronically homeless program participant enrolls in an SSVF RRH project. During the period of time the participant is receiving assistance, it is determined that the participant would be better served in PSH. The participant may transfer to a dedicated PSH project because they have maintained their chronically homeless status while in RRH.
- **Example 2**: A CoC RRH participant who entered the program as homeless and is a person with disabilities may transfer to a non-dedicated PSH project since they maintain their homeless status and met the eligibility requirements of non-dedicated PSH when they entered CoC RRH.

42. TH to TH

- Program participants who are residing in TH are considered homeless and are, therefore, eligible for a few other forms of assistance funded through the CoC and ESG Program. If a provider is unable to find a permanent housing placement for program participants in TH who are coming up on time limits, that participant could be eligible for other TH projects.

43. TH to PSH

- Some program participants residing in TH are eligible for PSH depending on the NOFA under which the PSH was funded. Some previous CoC Program NOFAs allowed TH participants to be served in PSH if the program participant has a qualifying disability and resided on the streets or ES prior to entering the TH OR those who were fleeing domestic violence.

44. Relationship Between VA’s Homeless Programs and HUD’s Program Types & Eligibility

The following chart is based on the CPD Memorandum: Guidance for Determining Eligibility for Permanent Supportive Housing for Persons Participating in Certain Department of Veteran’s Affairs Programs.¹⁸

HUD Homeless Program Type	VA Homeless Programs	Maintains Homeless Status	Maintains Chronically Homeless Status	Count Homeless Status on PIT Count	HUD Homeless Program Type Participants are Eligible to Enter upon Exit of This Program

¹⁸ <https://www.hudexchange.info/resource/3868/guidance-for-determining-eligibility-for-veterans-affairs-programs/>

Emergency Shelter (ES)	-VA-funded Health Care for Homeless Veterans(HCHV) provider programs -VA-funded VA Mental Health Residential Rehabilitation Treatment Program–Domiciliary Care for Homeless Veterans (VADOM)provider programs	YES	YES	YES NO-VADOM	TH RRH SH PSH
Safe Haven (SH)	-VA-funded Health Care for Homeless Veterans (HCHV) -VA Community Contract Safe Haven Program (HCHV/SH)	YES	YES	YES	TH RRH PSH
Transitional Housing (TH)	-VA Grant and Per Diem(GPD) -VA Compensated Work Therapy –Transitional Residence (CWT/TR)	YES	NO-HUD TH YES-VA TH ¹⁹	YES-Homeless NO-Chronically Homeless	RRH-(see NOFA) SH PSH (if they came from the streets or shelter when they entered the TH Program)
Rapid Re-housing (RRH)	-VA-funded Supportive Services for Veteran Families(SSVF) provider programs -Veterans Homelessness Prevention Demonstration Program(VHPD)	YES	YES	NO	PSH
Permanent Supportive Housing (PSH)	HUD-funded Veterans Affairs Supportive Housing(HUD-VASH)	NO	NO	NO	N/A

¹⁹ <https://www.hudexchange.info/faqs/1837/in-huds-cpd-memorandum-guidance-for-determining-eligibility/>

Appendix A: HUD Definitions

Homeless²⁰

Homeless means:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) An individual or family with a primary nighttime residence that is 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 or train station, airport, or camping ground; (ii) An individual or family living in a supervised 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, or local government programs for low income individuals); or (iii) An individual who is exiting 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;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that: (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (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: (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- (4) Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; and (iii) Lacks the resources or support networks, e.g., family, friends, faithbased or other social networks, to obtain other permanent housing

²⁰ https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

Chronically Homeless²¹

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.

Homeless Individual with a Disability²²

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.

²¹ <https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

²² https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

Appendix B: Eligibility & Prioritization Example

Projects with a population specific focus will receive referrals according to the orders of priority established as they apply to the population they serve. If there is not an eligible household who meets the first priority established within a project type, then the next priority would be considered to see if there is an eligible household that meets that priority. Please see the example below of how the eligibility and prioritization factors would be considered in a CoC RRH project.

Example CoC RRH Project

Eligibility: The CoC RRH project was funded in FY 15 to specifically serve persons who are fleeing or attempting to flee domestic violence.

Prioritization for CoC RRH:

- Eligible participants are referred to the rapid re-housing program for which they are eligible and prioritized based the following prioritization:
 1. Chronically Homeless individuals and families with the Longest History of Homelessness and with the Most Severe Service Needs
 2. Non-Chronically Homeless individuals and families with the Longest History of Homelessness and with the Most Severe Service Needs

Prioritization List

Household ID	Chronic	LOT	VI-SPDAT	DV Victim	Veteran
A1234	Yes	3 years	17	No	Yes
B5678	Yes	2 years	14	No	Yes
C91011	No	1 year	7	No	Yes
D121314	No	1 year	5	Yes	No
E151617	No	6 months	11	No	No
F181920	No	6 months	10	Yes	No

Household Chosen for Referral: D121314

As shown above, the household chosen for referral was not a chronic household because there were no chronic households on the Prioritization list that met the eligibility requirements of the project. Instead, the referral was based on the **eligible household** had the longest history of homelessness since that is the second priority factor to use. Although there are other persons with longer periods of homelessness, those persons did not meet the DV eligibility requirement of the project.