

**12 GUILFORD COUNTY CONTINUUM OF CARE WRITTEN STANDARDS FOR
NC- 504 – GUILFORD COUNTY COC**

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INTRODUCTION

The Continuum of Care (CoC) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within a given geographic area, which for the NC-504 CoC includes the following geographic areas: Guilford County, including the Cities of Greensboro and High Point. Both the Emergency Solutions Grant (ESG) Program Interim Rule and the Continuum of Care (CoC) Program Interim Rule state that the CoC, in consultation with recipients and subrecipients of Emergency Solutions Grants (ESG) Program funds within the geographic area, are responsible to (1) establish and consistently follow written standards for providing Continuum of Care assistance, (2) establish performance targets appropriate for population and program type, and (3) monitor recipient and sub-recipient performance.

These written standards have been established to ensure that persons experiencing homelessness who enter programs throughout the CoC will be given similar information and support to access and maintain permanent housing. All programs that receive ESG, City of Greensboro or CoC funding are required to abide by these written standards. Agency program procedure should reflect the policies and procedures described in this document. The CoC strongly encourages homeless programs that do not receive these funding sources to accept and utilize these written standards.

Many of these standards are based on the ESG and/or the CoC Program Interim Rules. There are additional standards that have been established by the CoC to assist programs in meeting and exceeding performance outcomes that will help to reach the goal of ending homelessness.

The Guilford County Continuum of Care Written Standards will include policies and procedures for:

- Evaluating individuals' and families' eligibility for assistance
- Standards for determining what percentage and amount of rent each household must pay while receiving rapid re-housing (RRH) assistance
- Performance measurements and benchmarks.

These standards are in place 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
- Ensure the local priorities are transparent to recipients and sub-recipients of funds
- Create consistency and coordination between recipients' and sub-recipients' projects

These written standards have been developed in conjunction with COC and ESG recipients and sub-recipients and with service providers. Thus, the implementation reflects the perspectives of those

organizations that are directly providing homeless housing and services, including Emergency Shelter (ES), Transitional Housing (TH), Permanent Supportive Housing (PSH) and Rapid Re-Housing (RRH).

The CoC Written Standards have been approved by the Guilford County CoC Board and CoC Members. The Written Standards will be reviewed and revised as needed at a minimum of once per year by the Coordinated Entry Committee. All revisions must be approved by the CoC Board. Agreement to abide by the Written Standards will be required to participate in the process for acquiring and maintaining CoC, City of Greensboro CDBG, Nussbaum, ESG Entitlement, and ESG funding.

PROGRAM REQUIREMENTS FOR ALL PROGRAMS

1. HOUSING FIRST & LOW BARRIERS

All CoC funded programs must adopt the Housing First and Low Barriers approach. The Housing First approach has several key features: few programmatic prerequisites, admission policies that support low barriers to access, rapid and streamlined entry into permanent housing, voluntary and engaging supportive services, and a focus on housing stability. As such, CoC funded projects should allow entry to program participants regardless of their lack of 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. NON-DISCRIMINATION, FAIR HOUSING, EQUAL ACCESS AND REASONABLE ACCOMMODATIONS

The Guilford County COC affirmatively markets housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, handicap or who are least likely to apply in the absence of special outreach. As such, providers must comply with non-discrimination, fair housing, equal access and reasonable accommodations laws including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II and III of the Americans with Disabilities Act. Each provider must have policies that speak to how the agency and specific programs will comply with these laws.

NON-DISCRIMINATION

A determination of eligibility for housing that is assisted by HUD or subject to a mortgage insured by HUD shall be made in accordance with the eligibility requirements provided for such program by HUD, and such housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status. 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.

FAIR HOUSING

The Fair Housing Act promotes housing that is accessible to and usable by persons with disabilities. Guilford County's Coordinated Entry partners will comply with the non-discrimination requirements of the Fair Housing Act, which prohibits discrimination in all housing transactions based on race, national origin, sex, color, religion, disability status and familial status.

EQUAL ACCESS

The Guilford County Continuum of Care non-discriminatory policy, regarding the U.S. Department of Housing and Urban Development (HUD) final rule regarding equal access to Community Planning and Development (CPD) funded programs regardless of sexual orientation, gender identity, and marital status, will ensure that individuals are aware of their rights to equal access to CPD funded programs.

Thus, all CPD funded programs, including Continuum of Care and Emergency Solutions Grant funded programs, must comply with the following requirements:

- Determine client eligibility for housing regardless of sexual orientation, gender identity, or marital status, and must not discriminate against clients who do not conform to gender or sex stereotypes (i.e., because of gender identity);
- Grant equal access to CPD funded programs or facilities consistent with client gender identity, and provide client's family with equal access;
- MUST NOT ask clients to provide anatomical information or documentation (i.e. ID), physical, or medical evidence of gender identity; and
- Take non-discriminatory steps when necessary and appropriate to address privacy concerns raised by any residents or occupants.

REASONABLE ACCOMMODATIONS AND MODIFICATIONS

The Fair Housing Act requires housing providers to make reasonable accommodations in rules, policies, practices or services to allow a handicapped person equal opportunity to use and enjoy the dwelling unit, including public and common use spaces. An accommodation must be made unless it would impose undue financial or administrative burden on a housing program or requires a fundamental alteration in the nature of the program. The owner/manager can request verification that the applicant is disabled and needs the accommodation, but cannot request information about the nature, extent or severity of a person's disability.

3. COORDINATED ENTRY PARTICIPATION

All CoC-funded and ESG-funded projects are required to participate in the CoC's Coordinated Entry (CE) System. Participation requires following all established policies and procedures as set forth in the *Coordinated Entry Policy and Procedures*.

4. HMIS PARTICIPATION

All CoC-funded and ESG-funded projects are required to participate in the Homeless Management Information System (HMIS) except for victim services providers (defined by Violence Against Women Reauthorization Act of 2013). Instead, victim services provider must use a comparable database to collect required client level data and be able to present this data to the System Performance and Evaluation Committee as needed. The CoC actively encourages non-CoC/ESG providers to participate in HMIS. All HMIS participating agencies should meet the minimum data quality standards and follow the *HMIS Policies and Procedural Manual*.

5. ACCESS TO MAINSTREAM RESOURCES

The CoC expects that every agency that is funded through the CoC or ESG will coordinate with and access mainstream and other targeted homeless resources. Providers should assess and assist participants with obtaining any mainstream resources for which they may be eligible, including: TANF, Public Assistance, Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Medicare, SSI/SSDI, or Access-VR. Where possible, providers should streamline processes that include applying for mainstream benefits such as the use of a singular form to apply for benefits or collecting all necessary information in one step. The SSI/SSDI Outreach Access and Recovery (SOAR) process is encouraged to speed up the SSI/SSDI process.

6. EDUCATIONAL LIAISON & EARLY CHILDHOOD SERVICES

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 and connected to appropriate services in the community, including early childhood projects such as Head Start.

7. EMERGENCY TRANSFERS

Projects should provide, when possible, emergency transfers for victims of domestic violence, dating violence, sexual assault or stalking to ensure their safety.

ELIGIBILITY

A tenant who is a victim of a domestic violence, dating violence, sexual assault or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for emergency transfer, if; the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding the request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described below. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

TRANSFER PROCEDURES

The tenant shall notify the agency's management office and submit a written request for a transfer. The agency will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

- A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the agency's housing program; OR
- A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for emergency transfer.
- The agency cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The agency will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The agency may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility.
- If the agency has no safe and available units for a tenant who needs an emergency transfer, the agency will contact Family Service of the Piedmont (our local DV provider) to assist the agency and tenant in identifying other housing providers who may have safe and available units for the tenant.

CONFIDENTIALITY

The housing agency will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives the agency written permission to release the information on a time-limited basis, or disclosure of the information if required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault or stalking against the tenant.

SECURITY AND SAFETY OF TENANTS

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant should be urged to take all reasonable precautions to be safe. Tenants who are or have been victims of domestic violence, sexual assault, stalking or human trafficking are encouraged to contact Family Service of the Piedmont's Crisis Line:

Greensboro (336) 273-7273

High Point (336) 889-7273

8. TERMINATION & GRIEVANCE PROCEDURES

Projects should not terminate clients regardless of whether they participate in supportive services, make progress on a service plan, lose their income or based on other activities not covered in a lease agreement typically found for an unassisted person in the project's geographic area.

Services should be terminated for only the most egregious behaviors such as matters of violence or serious threats (including sexual violence), major theft, major property damage, and/or possessing illegal substances. Domestic Violence shelters have legal obligations that allow for additional rules for termination of services. Providers must have a written termination policy outlining program rules and termination processes including a formal grievance process. This process, at 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.

RECORD KEEPING REQUIREMENTS FOR ALL PROJECTS

Participant Recordkeeping Requirements include:

- All records containing personally identifying information must be kept secure and confidential
- Programs must have a written confidentiality/privacy notice, provided to the participant if requested
- Documentation of homelessness and chronic homelessness, if applicable (following HUD guidelines)
- A record of services and assistance provided to each participant
- Documentation of any applicable requirements for providing services/assistance
- Documentation of use of the coordinated entry system
- Documentation of use of HMIS
- Records must be retained for the appropriate amount of time as prescribed by HUD

Financial Recordkeeping Requirements 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

PERMANENT SUPPORTIVE HOUSING (PSH)

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

ELIGIBILITY CRITERIA

- Households must meet the HUD definition of homelessness, with a priority for those who are chronically homeless.
- One adult or child member of the household must have a disability
- CoC funded programs must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.

MINIMUM STANDARDS OF ASSISTANCE

- There can be no predetermined length of stay for a PSH project
- 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.
- 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. Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability.
- Two individuals in shared housing situation must have their own lease and their own bedroom unless the two individuals present together as a household
- Program income generated from rent and occupancy charges may be collected from program participants and added to funds committed to the project by HUD and used for eligible program activities.
- If occupancy charges are imposed, they may not exceed the highest of:
 - 30% of family's monthly adjusted income
 - 10% of the family's income
 - Portion of welfare payments designated for housing (if applicable)
- A program participant's income must be re-examined annually to determine rent payment. A program participant's contribution toward the rental payment must be made as changes in income are identified. A participant can request an interim re-examination at any time based on change in income and/or family composition. Each program participant must agree to supply the information or documentation necessary to verify the participant's income.
- Assistance may be terminated to a participant who violates their lease by providing a formal process that recognizes due process of law.

All PSH programs will prioritize referrals provided at the weekly Coordinated Workgroup meetings. PSH is targeted for the most acute individuals and families and will always be prioritized for those who are chronically homeless. If there is not a chronically homeless individual or family on the list at the weekly

Coordinated Workgroup meetings, the next most acute individual or family will be targeted for PSH if appropriate.

RAPID RE-HOUSING (RRH)

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

CORE COMPONENTS

There are three core components that constitute a rapid re-housing program, all of which must be available to qualify as a rapid re-housing program. Although RRH programs must have each of the three components available, it is not required that a single entity provides all three services. Similarly, it is also not required that any one household utilize all three to be considered a recipient of rapid re-housing.

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

Housing Identification

- Recruit landlords to provide housing opportunities for individuals and families experiencing homelessness
- Address potential barriers to landlord participation such as a concern about the short-term nature of rental assistance and tenant qualifications
- Assist household to find and secure appropriate housing

Rent/Move-In Assistance

- Provide financial assistance (typically 6 months or less) necessary to allow individuals and families to move immediately out of homelessness and to stabilize in permanent housing.
 - Eligible costs for financial assistance for ESG funded programs include:
 - rental application fees
 - security deposits (up to 2 months)
 - last month's rent
 - utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears)
 - moving costs
 - Eligible costs for financial assistance for CoC funded programs include:
 - security deposits (up to 2 months)
 - first and last month's rent
 - property damage
 - rental application fees
 - utility deposits
 - moving costs

Case Management and Wrap Around Services

- Help individuals and families experiencing homelessness identify and select among various permanent housing options based on their unique needs, preferences, and financial resources.
- Help individuals and families experiencing homelessness address issues that may impede access to housing (such as credit history, arrears, and legal issues).
- Help individuals and families negotiate manageable and appropriate lease agreements with landlords.
- Make appropriate and time-limited services and supports available to families and individuals to allow them to stabilize quickly in permanent housing.
- Monitor participants' housing stability and be available to resolve crises, at a minimum during the time rapid re- housing assistance is provided.
- Ensure that services provided are client-directed, respectful of individuals' right to self-determination, and voluntary. Unless basic, program-related case management is required by statute or regulation, participation in services should not be required to receive rapid re-housing assistance.
- Utilize an Individual Service Plan (ISP) to outline the steps, goals, activities, actions, anticipated outcomes and timelines of the case management supports. An ISP should:
 - Be client driven. A Case Manager should not include any activities, directives or requirements that the client has not consented to in the ISP.
 - Be quickly expedited after program admission. An ISP should be written within two weeks of admission and should be focused on Housing Stability; Relationships; Basic Needs; Supports and Safety. ISPs shall include outcomes that measure changes in skill, knowledge, behavior, stability, sustainability, quality of life, etc.
 - Be updated as the needs and/or goals of the clients change or become better defined and/or as outcomes are achieved.
 - Be updated at least every 45 days or more frequently as appropriate.
 - Be client approved. Clients must sign the ISP and be provided a copy of the final document.

ELIGIBILITY CRITERIA

- Participants in ESG funded RRH programs must meet HUD's Category 1 definition of homelessness; and CoC funded RRH programs must meet the HUD Category 1 or 4 definition of homelessness.
- CoC funded programs must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.
- For ESG funded programs, program participant household's annual income should be at or below 30% Area Median Income (AMI) at annual re-evaluation.

All RRH programs will prioritize referrals provided at the weekly Coordinated Workgroup meetings. RRH will be targeted toward those who cannot get out of homelessness without the assistance. RRH will prioritize those with more challenges.

RENT LIMITS

- Financial assistance is available for maximum 24 months. However, it is expected that program participants will only receive the level of assistance necessary to be stably housed for the long term.
- Participants must begin paying 30% of their income (as defined by 24 CFR 5.609) toward rent within 60 days of program enrollment.
- The maximum amount of rent that a participant can pay will be 100% of the rental amount.
- Typically, at the beginning of assistance, RRH program will be paying 100% of the rent or utility. Participant's responsibility of rent/utility should be reviewed, determined, and explained to the participants by the RRH program and will gradually be increased to 100% within a determined timeframe.
- A household can only be eligible for RRH programs within the CoC geographic area no more than 2 times in 3 years and the total amount of assistance must not exceed \$10,000.
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.
- Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

MINIMUM STANDARDS OF ASSISTANCE

- Program participants are required to meet with a case manager not less than once per month.
- For ESG funded RRH programs, supportive services are limited to housing relocation and stabilization services (24 CFR 576.10). ESG RRH programs may provide housing stability case management assistance not more than 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the program participant is living in permanent housing.
- For CoC-RRH funded programs, supportive services include a wide range of services outlined in 24 CFR 578.53. CoC-RRH programs may provide supportive services until 6 months after rental assistance stops.
- CoC funded RRH programs: participants must enter into a lease agreement for a term of at least one year, which is terminable only for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. (24 CFR 578.37)
- ESG funded RRH programs: participants must enter into a lease for an initial term of one year for project-based rental assistance, there is no minimum lease period for tenant based rental assistance. The only exception is for rental assistance provided solely for arrears. (24 CFR 576.104) To continue to receive ESG and CoC RRH assistance, a program participant's reevaluation must demonstrate eligibility based on: 1) Lack of sufficient resources and support networks to retain housing without the program assistance. 2) The ESG or CoC funded program must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing at minimum every 3 months, preferably monthly.

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

ELIGIBILITY CRITERIA

- Households must meet the HUD definition of homelessness under categories 1, 2 and 4
- CoC funded programs must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders

MINIMUM STANDARDS OF ASSISTANCE

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Support services must be provided throughout the duration of stay in transitional housing.
- Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month and that ends in 24 months and cannot be extended. The lease with program participant must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

All CoC funded Transitional Housing programs will prioritize referrals from the weekly Coordinated Workgroup meeting, and will follow the *Coordinated Entry Policies and Procedures*. If beds are not filled at the weekly Coordinated Entry Workgroup meeting, the transitional program can fill those beds outside of the Coordinated Entry System.

EMERGENCY SHELTER (ES)

ELIGIBILITY CRITERIA

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

MINIMUM STANDARDS OF ASSISTANCE

- Shelter staff must attempt to divert and prevent homelessness
- Provide immediate (same day) admission to shelter
- ES should prioritize beds based on (1) length of time homeless; (2) chronic status; and (3) unsheltered to the best of their ability.

Homeless individuals/families seeking shelter must be provided shelter. Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. If there are no appropriate or available beds immediately available for the client at the location he/she is seeking assistance, then the agency must collaborate with another provider to place client into another appropriate shelter.

Shelters must meet or exceed minimum habitability standards specified in CFR 576.403 that covers the building structure and materials, access, space and security, interior air quality, water supply, sanitary facilities, environmental temperatures, light and electricity, food preparation, sanitary conditions, and fire safety.

There is no imposed limit on the length of stay. It is the discretion of the agency and program providing shelter services to set limits, if any, on the length of stay depending on the target population, client's barriers to obtain permanent housing, and other circumstances the client is facing. Households should only be referred to emergency shelters after exhausting all available options for diversion. Emergency shelter programs should be closely linked to the Coordinated Entry System (CES) to ensure clients are referred to the most appropriate housing resources including, but not limited to, rapid re-housing and permanent supportive housing. Linkages should also be made to applicable mainstream resources.

Per HUD, sheltered families with children cannot be broken apart. If no shelter is available on-site, an alternative living arrangement must place the family together which may include placement at another shelter/ housing provider that can house families, or hotel-motel rooms (only in areas where no other appropriate shelter is available).

Providers should aim to have clients leave the program into a permanent and stable housing situation. This can be placement into supportive housing, or client may become self-sufficient and able to maintain his/her own housing with a stable source in income.

If client leaves the program and is not stably housed, all efforts should be made to place client into another more appropriate shelter/ housing situation.

Vulnerable populations seeking shelter need access to appropriate shelter that is safe, sanitary, and meets or exceeds minimum habitability standards. This population includes victims of domestic violence, youth, people with special needs, the elderly, medically frail, mentally ill, and victims of human trafficking. Upon intake and if necessary, client may be referred and sheltered elsewhere in a more appropriate location. Emergency shelters that provide housing to victims of domestic violence must have an appropriate security system in place to protect housed victims of domestic violence from their perpetrators. There is no time limit on their length of stay. Clients are not discharged back out to the street or into unsafe living conditions, but if necessary are referred to another appropriate housing program.

MONITORING PERFORMANCE

CoC is responsible to monitor project level and system level performance annually or biennially. CoC System Performance and Evaluation Committee will consult with recipients and sub-recipients annually to establish performance targets appropriate for population and program type, monitor recipient and sub-recipient performance, evaluate outcomes, and take action to improve performance to the Guilford County CoC Board of Directors and Guilford County CoC Membership.

However, the CoC has established some minimum threshold criteria by program type:

- < 20% of those who exit to permanent housing will return to homelessness within 2 years of exit (all programs)

- 23% or less of negative exits
- 75% utilization rate (all programs)
- 95% HMIS data quality and completeness
- Maintain or Exit to permanent housing
 - 80% - RRH and PSH
 - 75% - Transitional Housing
 - 30% - Emergency Shelter
- Maintain or exit with cash income (earned or benefits)
 - 75% - PSH
 - 60% - RRH
 - 70% - TH

APPENDIX A: HOMELESS AND CHRONICALLY HOMELESS DEFINITION⁴

<p>Category 1</p>	<p>Literally Homeless</p>	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) 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 (iii) 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</p>
<p>Category 2</p>	<p>Imminent Risk of Homelessness</p>	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that: (i) 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 needed to obtain other permanent housing</p>
<p>Category 3</p>	<p>Homeless under other Federal statutes</p>	<p>(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 the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers</p>
<p>Category 4</p>	<p>Fleeing/ Attempting to Flee DV</p>	<p>(4) Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing</p>

⁴ https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf

Chronically Homeless Definition

The definition of “chronically homeless⁵⁷”, as stated in Definition of Chronically Homeless final rule is:

(a) 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 (a)(i) continuously for at least 12 months or on at least four 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 (a)(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 an institutional care facility;

(b) 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 (a) of this definition, before entering the facility;

(c) 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 (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

APPENDIX B HOMELESSNESS VERIFICATION REQUIREMENTS

<p>Category 1</p>	<p>Literally Homeless</p>	<ul style="list-style-type: none"> • Written observation by the outreach worker; or • Written referral by another housing or service provider; or • Certification by the individual or head of household seeking assistance stating that they were living on the streets or in shelter; • For individuals exiting an institution - one of the forms of evidence above and: <ul style="list-style-type: none"> ○ Discharge paperwork or written/oral referral; or ○ Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution
<p>Category 2</p>	<p>Imminent Risk of Homelessness</p>	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave; or • For individuals and families leaving a hotel/motel - evidence that they lack the financial resources to stay; or • A documented and verified oral statement; and • Certification that no subsequent residence has been identified; and • Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
<p>Category 3</p>	<p>Homeless under other Federal statutes</p>	<ul style="list-style-type: none"> • Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and • Certification of no PH in the last 60 days; and • Certification by the individual or head of household, and any available supporting documentation, that they have moved two or more times in the past 60 days; and • Documentation of special needs or 2 or more barriers

<p>Category 4</p>	<p>Fleeing/ Attempting to Flee DV</p>	<ul style="list-style-type: none"> ● For victim service providers: <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing and have no subsequent residence, and they lack resources. Statement must be documented by a self-certification by the intake worker. ● For non-victim service providers: <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and ○ Self-certification, or other written documentation, that they individual or family lacks the financial resources and support networks to obtain other permanent housing
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APPENDIX E HOMELESSNESS PREVENTION

The Guilford County CoC Homelessness Prevention (HP) program provides supportive services to prevent persons from becoming homeless in a shelter or an unsheltered situation. Funding may also be used to help such persons regain stability in their current housing or other permanent housing.

Basic Household Eligibility Requirements

- Initial Consultation & Eligibility Determination: The household must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed. Clients must meet one of the following definitions of homelessness:
 1. Literally homeless
 2. At imminent risk of homelessness
 3. Homeless under federal status
 4. Fleeing/attempting to flee domestic violence
- Income: The household's total income must be below 30 percent of Area Median Income (AMI)
- Housing Status: Case files must document the current housing status of the household at application. Housing status will be verified through third party verification whenever possible. Self-certification of housing status will be considered on a case by case basis.
- Guilford County Residency: All households receiving prevention or rapid re-housing assistance must be residents of Guilford County at time of application.
- Lack of identifiable financial resources and/or support networks: In order to receive rental financial assistance, applicants must also demonstrate the following:
 1. No appropriate subsequent housing options have been identified;
 2. The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
 3. The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

The following guidelines apply to Homelessness Prevention.

FINANCIAL ASSISTANCE	SERVICES
Moving costs	Housing search & placement
Rent application fees	Housing Stability Case Management
First and Last month's rent	Mediation
Utility payments –up to 24 mos. pmts or	Credit repair

6 mos. Arrears	
Security deposit equal to no more than 2 mos. rent	Legal Services
Utility Deposits	

Types of Rental Assistance	Length of Assistance
1. Short Term Rental Assistance	up to 3 Months
2. Medium Term Rental Assistance	4 to 24 Months
3. One time Payment of up to 6 months of Rental Arrears	One-time payment up to 6 on the Arrears

HP Performance Standards

Based on standards and goals of the local Continuum of Care, Guilford County is proposing the following performance standards for CoC programs:

- a. A reduction in the number of homeless individuals and families seeking emergency shelter services.
- b. Expected Outcome: At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance.

APPENDIX F STREET OUTREACH

The Guilford County Continuum of Care (CoC) and the Coordinated Entry System understands the importance of Street Outreach efforts in our community to identify and assist the most vulnerable homeless and chronically homeless individuals and families. The CoC defines Street Outreach as follows:

Street Outreach should be principally focused on one goal: supporting persons experiencing homelessness in achieving some form of permanent, sustainable housing. Street Outreach teams may use incentives/awards to encourage trust and build relationships, or to ensure that homeless households' emergency needs are met. The awards made should be used with permanent housing as the end goal rather than simply seeking to alleviate the burden of living on the streets.

TARGET POPULATION

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 as a regular sleeping accommodation for human beings. Examples include sleeping in a car, park, abandoned building, bus or train station, airport, or camping ground.

UNIVERSAL ASSESSMENT

All individuals and families served through street outreach programs will be assessed using a comprehensive, universal assessment tool called the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT). The VI-SPDAT will assist in making an informed and objective decision regarding the level of need, recommended housing intervention of each family, and streamline eligibility determinations.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

Street Outreach programs are required to enter clients in the Homeless Management Information System (HMIS) at first contact per the CoC Interim Rule (24 CFR 576 and 578). This helps to ensure coordination between service providers through the Coordinated Entry System (CES) while avoiding duplication of services and client data, and provides an opportunity to document homelessness.

COORDINATED ENTRY SYSTEM (CES)

To help ensure homeless households receive immediate housing and minimize barriers to housing access, all individuals and families assessed through street outreach will be entered into Guilford County's Coordinated Entry System (CES) through HMIS. CES is a CoC-wide process for facilitating access for all resources designated for homeless individuals and families. This system ensures that every homeless individual or family is known by name, provides

assistance based on the individual or family's unique needs, and matches them to the most appropriate service strategy or housing intervention. In doing so, CES ensures that Guilford County's limited resources are allocated to achieve the most effective results.

ENGAGEMENT

Unsheltered persons are engaged for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

Eligible engagement activities include:

- Making an initial assessment of needs and eligibility (VI-SPDAT)
- Providing crisis counseling
- Addressing urgent physical needs, such as providing meals, blankets, clothes or toiletries;
- Actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs.

CASE MANAGEMENT

Case management includes assessing housing and service needs, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant.

- Eligible services and activities are as follows:
- Using the Guilford County Coordinated Entry System (CES)
- Conducting the initial VI-SPDAT
- Verifying and documenting program eligibility
- Counseling
- Developing, securing and coordinating services
- Obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

EMERGENCY HEALTH SERVICES

Emergency health services include direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living. ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

Eligible treatment consists of:

- Assessing a program participant's health problems and developing a treatment plan
- Assisting program participants to understand their health needs
- Providing directly or assisting program participants to obtain appropriate emergency medical treatment
- Providing medication and follow-up services

SERVICES FOR SPECIAL POPULATIONS

Services for special populations include services for homeless youth, victim services, and services for people living with HIV/AIDS, LGBTQ populations, persons with mental illness, and disabled persons, so long as the costs of providing these services are one of the above eligible Street Outreach activities. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.