
LINCOLN CONTINUUM OF CARE WRITTEN STANDARDS

Emergency Solutions Grant and Continuum of Care Service Delivery
August 2018

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INTRODUCTION

Purpose:

The U.S. Department of Housing and Urban Development Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009. The HEARTH Act reauthorized the McKinney-Vento Homeless Assistance Act of 1987. The overall goal is to make homelessness a rare, brief, and non-recurring by reducing the duration of time people spend homeless and reducing recidivism back into homelessness.

The Continuum of Care Interim Rule was published on July 31, 2012 and took effect on August 30, 2012. The purpose of the regulation is to:

- Return households who experience homelessness to permanent housing in less than 30 days;
- Consolidate the Supportive Housing Program, Shelter Plus Care Program, and the Section 8 Moderate Rehabilitation Program;
- Promote a community wide commitment to the goal of ending homelessness;
- Provide Funding to quickly rehouse homeless individuals and families while minimizing trauma and dislocation;
- Promote access to mainstream benefits
- Optimize self-sufficiency;
- Provide funding to support the CoC structure and process; and
- Solidify the CoC structure and process.

The Interim Rule requires CoC's to establish and consistently follow written standards for providing CoC assistance in consultation with recipients of the Emergency Solutions Grant (ESG) Program. Each Emergency Solutions Grant (ESG) and Continuum of Care (CoC) funded service provider shall comply with the minimum written standards established and approved by the Lincoln Continuum of Care. Each provider will at the very least comply with the standards established in this document.

Programs Overview:

Emergency Solutions Grant Program (ESG)

The Emergency Solutions Grant Interim Rule broadened existing emergency shelter and homelessness prevention activities, placing greater emphasis on helping individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness by expanding prevention as an eligible use and adding a rapid rehousing component. ESG eligible components are:

- Street Outreach
- Homeless Prevention
- Emergency Shelter
- Rapid Rehousing
- HMIS

The Nebraska Department of Health and Human Services office of the Nebraska Homeless Assistance Program (NHAP) is a recipient of the U.S. Department of Housing and Urban Development Emergency Solutions Grant Program Funds and administers this award to eligible organizations referred to as sub-recipients through a performance based competition.

Continuum of Care Program

A Continuum of Care System is a community and regional-based process that provides a comprehensive and coordinated housing and service delivery system. The U.S. Department of Housing and Urban Development (HUD) initiated the Continuum of Care process in 1994. The process promotes a coordinated, strategic planning approach for programs that assist families and individuals who are homeless or at risk of homelessness.

A Continuum of Care System has the goal of stably housing all persons who are homeless or at risk of homelessness in appropriate housing. This means identifying all homeless and at risk of homeless populations in communities, understanding their needs, and building a comprehensive and responsive system which encompasses homeless prevention, outreach, intake and assessment, emergency shelter, transitional programs, supportive housing, permanent housing and all appropriate support services.

The University of Nebraska-Lincoln, Center on Children, Families and the Law (CCFL) has been designated by the Lincoln CoC as the Collaborative Applicant.

STANDARDS FOR ALL PROGRAM TYPES

The Lincoln CoC practices a person-centered model that strongly incorporates participant choice and inclusion of subpopulations present in the Lincoln including, but not limited to persons experiencing chronic homelessness, veterans, unaccompanied and youth ages 18-24, households with children, and victims of domestic violence or other life-threatening interpersonal violence.

Fair Housing and Equal Opportunity:

The Continuum of Care (CoC) does not tolerate discrimination on the basis of race, color, national origin, ancestry, religion, age, familial status, veteran status, disability, sex, actual or perceived sexual orientation, gender identity or expression, marital status, source of income, or other reasons prohibited by law.

The CoC and all sub-recipient organizations receiving CoC or Emergency Solutions Grant (ESG) Program funds must comply with applicable equal access and nondiscrimination provisions of federal, state and local civil rights laws. All recipients and sub-recipients of CoC and ESG Program funding must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 CFR.5.105 (a); including but not limited to:

- Fair Housing Act (42 USC 3601-19)
 - Section 504 of the Rehabilitation Act
 - Title VI of the Civil Rights Act
 - Title II of the Americans with Disabilities Act
 - HUD's Equal Access Rule
- **Affirmatively Furthering Fair Housing**
- Providers must have non-discrimination policies in place and conduct assertive outreach to people least likely to engage in the homeless system. Organizations receiving CoC Program and ESG Program funding shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability; and, shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights. (80 FR 42271)
- **Integration and Accessibility**
- Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. Organizations shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible. (24 CFR 578.93)

- **Reasonable Accommodations and Modifications for Persons with Disabilities**

Organizations are required to provide reasonable accommodations and modifications for persons with disabilities. For federally-funded housing, the recipient is responsible for paying for the modification. Organizations must inform applicants during the intake process of their right to request a reasonable accommodation or modification. A reasonable modification is a structural change, and a reasonable accommodation is change to rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space. An example of a reasonable modification is installing a grab bar in the bathroom of a person with a disability, while examples of reasonable accommodations include, permitting a person with a disability to have a service animal.

- **Discrimination Based on Actual or Perceived Gender**

HUD's *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule* (Equal Access Rule) requires that HUD's housing projects be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. The rule defines "gender identity" to mean "actual or perceived gender-related characteristics." The final rule also prohibits owners and administrators of HUD-assisted or HUD-insured housing, approved lenders in an FHA mortgage insurance program, and any other recipients or sub-recipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing.

There is a limited exception to this rule: Temporary, emergency shelters and other buildings and facilities that are not covered by the Fair Housing Act because they provide short-term, temporary accommodations may provide sex-segregated accommodations, which they sometimes do to protect the privacy and security of individuals when the buildings and facilities have physical limitations or configurations that require shared sleeping quarters or shared bathing facilities. For purposes of this rule, shared sleeping quarters or shared bathing facilities are those that are designed for simultaneous accommodation of multiple individuals in the same space. For example, a single-user bathing facility with a lock on the door is not designated for simultaneous occupancy by multiple individuals, so it is not a "shared bathing facility" for purposes of the Equal Access Rule or this rule. (24 CFR Part 5)

Organizations should ensure that its services do not isolate or segregate victims of domestic violence based upon actual or perceived gender identity.

- **Discrimination Based on Household Composition**

Organizations cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any member of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or

gender identity. 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. homeless veterans), 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 who reside together.

- **Prohibition Against Involuntary Family Separation**

The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to any housing or shelter receiving funding from either ESG or CoC (576.102; 578.93(e))

- **Guidance for Placement of Transgender Persons in Single-Sex Emergency Shelters or Other Facilities**

Organizations operating ESG-single-sex emergency shelters (or other ESG- and/or CoC facilities) may not make a determination about services for one participant based on the complaints of another participant when those complaints are based on a participant's gender identity or non-conformity with gender stereotypes. For the purpose of assigning a participant to sex-segregated or sex-specific services, it is a requirement that intake staff and emergency housing providers ask a transgender participant which group or service the participant wishes to join. The organizations must take reasonable steps to address safety and privacy concerns; the organization should provide for privacy in bathrooms and dressing areas. For instance, organizations may install privacy curtains or partitions. When deciding how to house a victim of domestic violence, an organization that provides sex-segregated housing may consider on a case-by-case basis whether a particular housing assignment would ensure the victim's health and safety. A victim's own views with respect to personal safety deserve serious consideration. The organizations should ensure that its services do not isolate or segregate victims of domestic violence based upon actual or perceived gender identity.

- **Prioritized Subpopulations and Fair Housing Implications**

Organizations shall comply with applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness. Subpopulations may be prioritized as long as doing so does not discriminate against any protected class under federal nondiscrimination laws (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless households); subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project (e.g., substance use disorder treatment, domestic violence services,

or a high intensity package of services designed to meet the needs of hard-to-reach homeless persons).

- **Dedicated versus Prioritized**

Projects and/or beds that are dedicated to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving households experiencing chronic homelessness must continue serving those households). This means that if two otherwise eligible households are seeking admission into the program, one who falls within the designated prioritized subpopulation and one who does not, the household who is in the designated prioritized subpopulation must be given priority for admission.

If there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, organizations should not hold the unit vacant, but instead should serve the next prioritized subpopulation who may benefit from the services being provided.

- **Fair Housing Implications**

The Local Standards establish priority subpopulations by project type (i.e. Permanent Supportive Housing); organizations may not set more restrictive priorities. For instance, while a Permanent Supportive Housing project may prioritize households experiencing chronic homelessness with a qualifying disability per the Local Standards, beds may not be reserved to persons with a specific disability (i.e. physical disability). If an individual, who is otherwise qualified, but who does not have a physical disability, seeks admission and would benefit from the services offered, this person may not be excluded from the project. Organizations may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

HMIS Participation:

Providers, except for victim service providers shall actively utilize the Homeless Management Information System (HMIS), to enter data on people served and assistance provided under ESG. Victim service providers shall actively utilize a comparable data system that meets HUD's standards (24 CFR 576.107).

Every four years, the Lincoln CoC will engage in a procurement process to select the HMIS lead and to manage the HMIS system. The HMIS lead will be responsible for CoC, ESG, and NHAP HMIS activities. Continuity is a critical factor in a well-run HMIS system; therefore preference in the procurement may be granted to the existing provider. The HMIS provider will recommend to the CoC an HMIS software solution for the CoC.

The Lincoln CoC has designated the University of Nebraska-Lincoln as the HMIS lead entity. The HMIS lead entity is responsible for:

- Maintaining and updating the HMIS data system
- Providing training and support to all HMIS users
- Supporting a HMIS coordinator in each of the CoC's regions
- Generating regular reports based on HMIS data including counts of homeless persons and performance reports on CoC and ESG funded providers.
- Providing reports to HUD as required including the Annual Homelessness Assessment Report (AHAR).

Participant Inclusion:

Each CoC-funded project is expected to engage participants in ongoing program evaluation and quality improvement processes. Toward that end, at a minimum, each project is required to survey or interview participants at least annually to obtain feedback on program service quality, the housing and service environment, and opportunities for improvement.

Each CoC-funded organization must have the opportunity to have participant representation on a governing or decision-making body.

Access to Main Stream Resources:

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

- Appropriate support services including: permanent housing; medical health treatment; behavioral health services, counseling, supervision and other services needed for independent living.
- Other governmental and private assistance available to help with housing stability including: Medicaid, Medicare, Supplemental Nutrition Assistance Program (SNAP); Women, Infants and Children (WIC); Federal-State Unemployment Insurance Program; Supplemental Security Income (SSI), social security disability insurance (SSDI); child and adult care food program and other available assistance.

Program Coordination:

Minimum standards for program coordination consist of on-going system and program coordination and integration of ESG and CoC funded activities to the maximum extent practicable with the following:

- Emergency shelter providers, essential services providers, homelessness prevention, transitional housing, permanent supportive housing and rapid rehousing assistance providers;
- Other homeless assistance providers, including: HUD-Veterans Affairs Supportive Housing (HUD-VASH); Education for Homeless Children and Youth Grants for State and Local

Activities (McKinney-Vento Homeless Assistance Act); Grants for the Benefit of Homeless Individuals; Healthcare for the Homeless; Programs for Runaway and Homeless Youth; Projects for the Assistance in the Transition from Homelessness; Services in Supportive Housing Grants; Emergency Food and Shelter Program; Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Program; Homeless Veterans Reintegration Program; Domiciliary Care for Homeless Veterans Program; VA Homeless Providers Grant and Per Diem Program; Health Care for Homeless Veterans Program; Homeless Veterans Dental Program; Supportive Services for Veterans Families Program; and Veterans Justice Outreach Initiative

- Mainstream service and housing providers: Public housing programs assisted under section 9 of the U.S. Housing Act of 1937; Housing programs receiving Section 8 tenant based or project based assistance; Supportive Housing for Persons with Disabilities; HOME Investment Partnerships Program; Temporary Assistance for Needy Families; Health Center Program; State Children's Health Insurance Program; Head Start; Mental Health and Substance Abuse Block Grants; Services funded under the Workforce Investment Act; and State Housing Related Assistance Program for Adults with Serious Mental Illness

Participant Income Determination:

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income, all amounts (monetary or not) is defined as:

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in paragraph (c) of 24 CFR 5.609.
- Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Individuals and families assisted under ESG are required to have annual incomes at or below 30% of Area Median. There are no income limits for CoC assistance but in all instances in which participants are charged rent or occupancy charges, the amount charged must be based on participant's verified annual income for all sources.

In verifying income, ESG and CoC funded providers are required to obtain third party verification whenever possible. Self-certification or verification is to be accepted only when all efforts have been made to obtain third party verification have not produced results.

Program income:

Minimum standards for private non-profit organizations for program income earned during the project period are that the program income shall be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income shall be retained. Program income may be used to meet matching funding requirements.

Access to Educational Resources:

All Lincoln ESG and CoC providers are responsible for coordinating with local school district(s) in the following way (Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.)):

- Helping to identify children and young adults who are eligible for educational services. If a child or young adult does not have a fixed, regular, and adequate place to sleep at night, he or she is eligible. This includes those living in places not meant for human habitation, emergency shelters, transitional housing, motels/hotels, campgrounds, in doubled-up situations, or in housing that lacks utilities, is infested or has other dangerous conditions.
- Helping to ensure that all families with children and young adults who qualify in are informed about their educational rights and their eligibility for educational services and they receive those services.
- Ensuring that the local school districts' homeless liaisons are aware the All Doors Lead Home Coordinated Entry processes for connecting homeless families and young adults to ESG & CoC resources and helping to resolve any issues that might arise in linking eligible households to those resources.
- Helping to ensure that when placing families in emergency, transitional or permanent housing, consideration is given to the educational needs of children, including placing children as close as possible to schools of origin and early childhood education programs.

Conflicts of Interest:

Minimum standards for conflicts of interest are:

- Organizational conflicts of interest:
 - ESG and CoC assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent.
 - No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.
- Individual conflicts of interest:
 - When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government).

- All transactions/activities:
 - No CoC board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.
 - Conflicts prohibited: No person involved with the ESG or CoC programs or who is in a position to participate in a decision-making process or gain inside information regarding the program's activities, shall obtain a financial interest or benefit from an assisted activity; have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds (either himself or herself or those with whom he or she has family or business ties) during his or her tenure or for one year following tenure.
 - Persons covered: These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider's agency.
 - Exceptions : A provider may request an exception to these provisions from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404 and/or 578.95(d)(2)

Termination of Assistance:

If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted.

- Due process rights for individuals and families facing program termination: When an ESG or CoC funded homeless assistance program seeks to terminate participation for any household, the required formal process shall minimally consist of:
 - Written notice clearly stating the reasons for termination;
 - Review of the decision that gives the participant opportunity to present objections to the decision and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker; and
 - Prompt written notice of the final decision on the appeal.
- Ability to provide further assistance: Termination will not bar the provider from providing later additional assistance to the same family or individual.

Displacement:

Minimum standards for minimizing the displacement of persons (families, individuals, businesses, nonprofit organizations and farms) as a result of a project assisted under ESG and/or CoC shall comply with §576.408 and/or 578.83 and consist of:

- Minimizing displacement: Consistent with ESG/CoC goals and objectives, the providers shall minimize displacing people as a result of ESG/CoC-funded projects.

- Temporary relocation not permitted: No temporary relocation shall be required for an ESG/CoC-funded project. When a tenant has to move for an ESG/CoC-funded project, the tenant shall be treated as permanently displaced and offered relocation assistance and payments.
- Relocation assistance for displaced persons:
 - In general: A displaced person shall be provided relocation assistance and advised of his or her Fair Housing Rights.
 - Displaced Person: A “displaced person” is defined as any person that moves from a permanent home as a result of ESG/CoC-funded acquisition, rehabilitation, or demolition of a project.
- A person does not qualify as a “displaced person” if the person:
 - Was evicted based on a violation of the lease or occupancy agreement; violation of the law; and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
 - Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a “displaced person.”
 - The person is ineligible under 49 CFR 24.2.
 - HUD determines that the person was not displaced as a result of the project. The State or the provider may request that HUD determine whether or not a displacement would be covered by this rule.
- Real property acquisition requirements: The acquisition of real property for an ESG/CoC funded project is subject to the URA and Federal government wide regulations.
- Appeals: A person who disagrees with the recipient’s determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance may file a written appeal. A low-income person who disagrees with the recipient’s determination may submit a written request for review of that determination by HUD.

Recovered Materials:

Minimum standards for the procurement of recovered materials shall comply with the requirements identified in §576.407(f) and 578.99(b), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year

exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

Faith-Based Activities:

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

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

Records and Recordkeeping:

Minimum standards shall ensure sufficient written records are established and maintained to enable the State and HUD to determine whether ESG/CoC requirements are being met and comply with §576.500 and 578.103, including the following:

- CoC records shall include the following documentation related to establishing and operating the Continuum of Care:
 - Evidence that the Board selected meets the requirements of 578.5(b);
 - Evidence that the CoC has been established and operated as set forth in subpart B of 24 CFR part 578 including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least every five years, evidence required for designating a single HMIS for the CoC, and monitoring reports of recipients and sub-recipients.
 - Evidence that the CoC has prepared the HUD application for funds in accordance with 578.9
- Program participant records shall include written:
 - Determination and verification/certification that the program participant met the criteria for being Homeless or At Risk of Homelessness and that an effort was made to obtain written third-party verification, when possible and applicable.
 - For CoC and ESG funded projects, acceptable evidence of homeless status as set forth in 24 CFR 576.500(b).

- The order of priority for obtaining evidence of homelessness and/or at risk of homelessness are: 1) third-party documentation, 2) intake worker observations and 3) self-certification.
- Determination and verification/certification that the program participant was eligible or ineligible for the particular services and/or financial assistance
- Determination and verification/certification that the program participant lacked sufficient resources and support networks to provide the assistance
- Determination and verification/certification that the program participant met income requirements and that an effort was made to obtain written third-party verification, when possible and applicable. This includes annual documentation of income for each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant.
- Determination and verification/certification that the only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities.
- Identification of the specific services and financial assistance amounts that were provided to the program participant
- When applicable, verification that the services were terminated in compliance with 576.402 and/or 578.91.
- When adopted by the Continuum of Care, a copy of the CoC-approved coordinated entry assessment or VI-SPDAT of the program participant
- Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements
- Determination and verification that the housing unit met HUD's habitability and lead-based paint standards
- Copy of individualized housing stability plan
- Notes verifying case management services were provided at least monthly, unless exempt from this requirement
- Notes verifying program participant's eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services
- Notes verifying program participant was assisted to obtain necessary mainstream and other resources
- Program policies and procedures shall indicate:
 - Services are coordinated with Continuum(s) of Care, other homeless assistance/prevention programs and mainstream service and assistance programs
 - Compliance with HUD's ESG/CoC (24 CFR 576 and 578) requirements for:
 - Shelter and housing standards
 - Conflict of interest
 - Homeless participation
 - Faith-based activity

- Nondiscrimination, equal opportunity and affirmative outreach
 - Uniform administrative rules (24 CFR part 84)
 - Environmental review
 - Lobbying and disclosure (24 CFR part 87)
 - Displacement, relocation and acquisition
 - Procurement (24 CFR 84.40-84.48)
- Program participant records are kept secure and confidential
 - Participation in HMIS or comparable database
- Financial records shall include:
 - Supporting documentation for all costs charged to ESG or CoC grant
 - Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
 - Documentation of the receipt and use of program income ○
Documentation of the receipt and use of matching funds ○
Copies of procurement contracts

Guiding Principles

Housing First:

All housing providers funded by the CoC shall use the Housing First model as outlined below. Housing First is a programmatic and systems approach that prioritizes providing housing to people experiencing homelessness quickly without preconditions or service participation requirements, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life.

This approach is guided by the belief that people need basic necessities, like food and a place to live, before attending to anything less critical, such as getting a job, budgeting properly, or attending to substance use issues.

Core Elements of Housing First at the Project Level

- Access to projects is not contingent on sobriety, minimum income requirements, lack of a criminal record (including status on the sex offender registry), completion of treatment, participation in services, status or other unnecessary conditions.
- Projects do everything possible not to reject a household on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy, and building and apartment units include special physical features that accommodate disabilities.

- Housing and service goals and plans are highly tenant-driven.
- Participation in services is voluntary and not a condition of tenancy, but can and should be used to persistently engage participants to ensure housing stability.
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants' lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.
- Every effort is made to provide a tenant the opportunity to transfer from one housing situation or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.
- Projects that cannot serve a household work through the coordinated entry process to ensure that the household has access to other housing and services such as: prevention assistance, homeless dedicated housing and services, and community-based affordable housing

Person- Centered:

A trauma-informed approach that is dignified, safe, and incorporates participant choice is utilized.

- Assistance is allocated effectively and households are linked to the most appropriate intervention strategy
- Reduction in number of households experiencing homelessness
- Reduced length of time a households experiences homelessness
- Reduced returns to homelessness (recidivism)

Strength-Based:

An asset-based approach that focuses on the inherent strengths of participants, and deploys these personal strengths to aid in the achievements of the participants' goals. Specifically:

- Every individual, group, family, and community has strengths.
- Trauma, illness, and struggle may be injurious but they may also be sources of challenge and opportunity.
- There is no limit to a person's growth, achievement, or success.
- We best serve participants by collaborating with them.
- Every environment is full of resources.

Coordinated Entry:

The All Doors Lead Home Coordinated Entry system was created by the BOS and Lincoln Continuum of Care (CoC) to effectively provide for and meet the requirements of the coordinated entry system for the most vulnerable homeless population in the BOS and Lincoln CoC that would be best served in Permanent Supportive Housing (PSH), Rapid Rehousing (RRH) and Transitional Housing (TH) following a housing first model, in accordance with HUD's requirements (24 CFR Part 578, 24 CFR 576.400(d)). All CoC and ESG providers are required to use the established and approved All Doors Lead Home Coordinated Entry System to select individuals and/or families with the highest priority for their programming.

For further details on established Coordinated Entry protocols and procedures, see All Doors Lead Home Coordinated Entry Operations Manual.

HOMELESS ASSISTANCE SERVICES AVAILABLE

ELIGIBILITY BY COMPONENT				
COMPONENT**	FUNDING	HOMELESS STATUS CATEGORY*	TARGET POPULATION	INCOME
HOMELESSNESS PREVENTION	ESG	At-risk: 1,2,3 Homeless: 2,4	See "ESG Homeless Prevention" Section for further eligibility criteria	
EMERGENCY SHELTER	ESG	1,2,4	N/A	N/A
TRANSITIONAL HOUSING	CoC	1,4	1. Youth age 18-24; 2. Households fleeing Domestic Violence; 3. Households in recovery from substance use disorder	N/A
RAPID REHOUSING	ESG, CoC	1,4	1. VI-SPDAT Score 4-7 2. Households with the longest history of homelessness 3. People with VISPDAT score 9+, who do not qualify for PSH	No income requirement at entry****
PERMANENT SUPPORTIVE HOUSING***	CoC	1,4	Dedicated or Prioritized to households experiencing chronic homelessness, as defined by HUD.	

Homeless Prevention Standards

Participant Eligibility:

People who qualify as ‘at risk of homelessness,’ based on categories (2 or 4) of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for the following services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106):

- Housing Relocation and Stabilization Services: moving costs, rent application fees, security deposits, last month’s rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management
- Rental Assistance: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord. (NOT ALLOWABLE: mortgage and mortgage arrearage payments)

Street Outreach Standards

Participant Eligibility:

People who qualify as ‘unsheltered homeless,’ based on category (1)(i) of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): engagement, case management, emergency health and mental health services, transportation

Service Provision:

Often time’s street outreach workers are the initial point of contact, and have the ability to maintain contact throughout the process, as well as connect individuals and families with mainstream resources and community based services as needed.

- Educated and trained on the process of Coordinated Entry and how to perform the initial standardized assessment and make referrals.

- Maintain contact and open communication regarding housing status and resources being utilized.
- Provide assistance to those unsheltered who may be in need of additional supports.

Emergency Shelter Standards

Participant Eligibility:

People who qualify as 'homeless,' based on categories (1, 2, or 4) of the "homeless" definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.102): case management; child care; education, employment and life skills services; legal services (not allowable: mortgage and mortgage arrearage payments); health, mental health and substance abuse services; transportation.

Minimum Standards:

- Admission: Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of "homeless," as specified in 24 CFR 576.2 (1, 2, & 4) and agencies' eligibility criteria.
- Assessment: Individuals and families shall be offered an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
- The following Emergency Shelter services, as needed and appropriate can be provided: case management, Child care, Education services, Employment assistance and job training, Outpatient health services. Legal services, Life skills training, Mental health services, Substance abuse treatment services, Transportation and services for special populations.
- Prioritization/Diversion/Referral: When appropriate based on the individual's needs and wishes, the provision of or referral to Rapid Rehousing services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized for individuals who are literally homeless. Referrals to Transitional Housing shall be made for individuals who either meet special populations (TAY, Individuals fleeing domestic violence, institutional re-entry and substance abuse recovery housing) or other populations for which transitional housing meets the needs of the homeless individual.
- Reassessment: Program participants will be reassessed as case management progresses, based on the individual service provider's policies.
- Discharge/Length of Stay: Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained

safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants. Providers of shelter services are strongly encouraged not to discharge individuals and families who have not secured permanent housing and maintain those households in shelter until they can be placed in appropriate permanent housing.

- Safety and Shelter Safeguards for Special Populations: Safety and Shelter Safeguards shall be determined by the individual Special Population service provider's policies and clearly communicated to program participants

Transitional Housing Standards

Participant Eligibility:

Transitional housing facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering the housing. Eligible persons for transitional housing meet the homeless definition based on categories 1, 2 and 4. Providers of transitional housing services shall arrange for or make available services to participants to assist them in securing permanent housing within specified time periods. Transitional housing may be provided in scatter site or single site locations. Individuals and families assisted in transitional housing shall be provided housing accommodations as well as a services program intended to address issues that may hinder the household from obtaining or maintaining stable long term housing.

Limitation on Occupancy:

No individual or family may be assisted in transitional housing for a period in excess of 24 months. No person shall be discharged from transitional housing into homelessness as a result of this limitation. Transitional housing programs are expected to place individuals and families into permanent housing within 12 months. Programs that maintain participants for longer than 24 months or those with over half their participants remaining for over 12 months may have their funding discontinued.

Participant Contribution:

Individuals and families residing in transitional housing are not required to pay rent. Providers of transitional housing may impose occupancy charges. If the provider elects to charge rent or occupancy charges, the charges may not exceed those specified in 578.77.

Program Fees:

No fee other than rent or occupancy charges as specified above may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants.

Occupancy Agreements:

All individuals and families served in transitional housing must be provided an occupancy agreement for a minimum of a monthly term and which can be renewed provided that the household does not remain in transitional housing for longer than 24 months. The agreement must specify the requirements for program participation. With the exception of programs providing recovery focused services for persons with substance use disorders, residents in transitional housing may not be required to participate in disability related services. Participants may be required to participate in services that are not disability related and may discharge participants for failure to participate in these services. No person may be terminated from transitional housing without first being provided the right to appeal that decision in accordance with the due process provisions at 24 CFR 578.91(b)

Rapid Rehousing Standards

Participant Eligibility:

CoC and ESG funded rapid rehousing will follow the standards as set forth below. People who qualify as 'homeless,' based on categories (1 or 4) of the "homeless" definition found at 24 CFR 576.2 and/or 578.3 and who are moving into a housing unit that meets HUD's habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG and CoC rules (24 CFR 576.104, 576.105, 576.106, 578.37, 578.51 and 578.77,). Persons who meet the 'category 2' homeless definition are eligible for CoC funded Rapid Rehousing provided the project was not funded under special NOFA conditions (reallocated projects) that limit eligibility to those living on the streets or in shelters. Additionally persons receiving rapid rehousing through the ESG program must have incomes at or below 30% of the area median income (AMI) at annual recertification:

- Housing Relocation and Stabilization Services: moving costs, rent application fees (ESG only), security deposits, last month's rent, utility deposits, utility payments,(ESG only) housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management
- Rental Assistance: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant- based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent (arrearages covered under ESG only). Rent amount must not exceed HUD's published Fair Market Rent and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental assistance agreement between the landlord and agency and a written lease between tenant and landlord. Each provider offering rapid rehousing must reevaluate the need for continued assistance every 90 days. Continued assistance will be provided for up to three (3) months at a time. Eligibility and income shall be reviewed no less frequently than

annually. Participants in rapid rehousing are required to meet with case managers no less frequently than monthly, unless except from this requirement per HUD's policy priority of using a Housing First approach or Violence against Women Act (VAWA) regulations (NOT ALLOWABLE: Mortgage and mortgage arrearage payments.)

Prioritization:

All Doors Lead Home Coordinated Entry Prioritization Formula:

1. Chronic Status (after Documented up) – 10 points
2. VI SPDAT score (which captures service need, history, vulnerability, etc.)
3. Fleeing Domestic Violence – 1 point
4. Veteran – 1 point
5. TAY – 1 point
6. 0-3 months homeless – 0 points
7. 4-6 months – 2 points
8. 7-9 months – 4 points
9. 10-12 months – 6 points

Participant Contribution:

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or rapid rehousing assistance are:

- Participant's income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant's file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.
- Participants are not required to contribute rent. Providers funded under ESG or CoC may pay up to 100 percent of the reasonable rent and utility costs for program participants. Providers may, at their discretion, choose to impose rental charges on participants. In the event that providers elect to charge rent or occupancy charges, these charges may not exceed those established in 24 CFR 578.77.
- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants.

Rental Assistance Duration and Adjustment:

Minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time are:

- Participants receive approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each month of financial assistance received. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- Approval for initial rental assistance shall be granted per the individual service provider's written policy and protocols. Providers must re-assess the continuing need for rental assistance not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.
- In no event will assistance under rapid rehousing or homelessness prevention exceed 24 months in any 36 month period.

Service Type, Amount, and Duration:

Minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant shall receive, such as the maximum amount of assistance, maximum number of months the program participant may receive assistance; or the maximum number of times the program participant may receive assistance are:

- Financial Assistance:
 - Use with other subsidies – Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments, except for a one-time payment of rental arrears on the tenant's portion of the rental payment or deposit for subsidized housing.
 - Rental application fees [ESG only] – Payment shall only be made for fees charged by the owner to all applicants.
 - Security deposits – Payment shall not exceed two (2) month's rent.
 - Last month's rent – Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total rental assistance.
 - Utility deposits [ESG/CoC] – Payment shall only be made for gas, electric, water and sewage deposits.
 - Utility payments [ESG only]:
 - Payment shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service.
 - A partial payment counts as 1 month.

- Payment shall only be made if the utility account is in the name of the participant or a member of the same household.
- Payment shall only be made for gas, electric, water and sewage costs.
- Participants shall not receive more than 24 months of utility assistance within any 3-year period.
- Moving costs [ESG/CoC] – reasonable one-time moving expenses are eligible.

- Housing Relocation and Stabilization Services:

- Housing search and placement services – Payment shall only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:
 - Assessment of housing barriers, needs and preferences
 - Development of an action plan for locating housing
 - Housing search
 - Outreach to and negotiation with owners
 - Assistance with submitting rental applications and understanding leases
 - Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness
 - Assistance with obtaining utilities and making moving arrangements
 - Tenant counseling

Payment for housing search and placement services shall not exceed 24 months during any 3-year period.

- Housing stability case management – Payment shall only be made for assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:
 - Using the centralized or coordinated assessment system
 - Conducting the initial evaluation, including verifying and documenting participant eligibility
 - Counseling
 - Developing, securing and coordinating services and obtaining Federal, State and local benefits
 - Monitoring and evaluating participant progress
 - Providing information and referral to other providers
 - Developing an individualized housing and service plan
 - Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days.

Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

- Mediation [ESG only] – Payment shall only be made for the cost of mediation between the participant and the owner or person with whom the participant is living, if it is necessary to prevent the participant from losing the permanent housing where he/she resides. Payment for mediation services shall not exceed 24 months during any 3-year period.
- Legal services – Payment shall only be made for the cost of legal services, if they are necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the participant losing the permanent housing where he/she resides. Payment for legal services shall not exceed 24 months during any 3-year period. Assistance may NOT be provided for immigration, citizenship or mortgage related matters. Payment arrangements may NOT include retainer or contingency fee agreements. Eligible subject matters for legal services include: child support, guardianship, paternity, emancipation, legal separation, orders of protection for victims of domestic violence, appeal of benefit claim denials, landlord tenant disputes and resolution of outstanding criminal warrants. Only approved Legal Services provider through NHAP can provide ESG legal services.
- Credit repair [ESG only] – Payment shall only be made for the cost of assisting the participant in obtaining skills related to household budgeting, managing money, accessing a free personal credit report and resolving personal credit problems. Payment will not be made for a debt or modification of a debt. Payment for credit repair services shall not exceed 24 months during any 3-year period.
- Rental Assistance:
 - Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based (ESG only) housing.
 - Payment for short-term rental assistance shall not exceed 3 months.
 - Payment for medium-term rental assistance shall be for more than 3 months, but shall not exceed 24 months.
 - Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees [ESG funded projects only – CoC not eligible]
 - Except for a one-time payment of rental arrears on the participant’s portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments. [ESG only]

- Payment shall not exceed the Fair Market Rent established by HUD and shall comply with HUD's standard of rent reasonableness (24 CFR 982.507).
 - Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
 - Payment for shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant's lease.
 - Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.
 - Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears (ESG only).
 - Payment shall only be made for units that have been inspected for HUD Housing Quality Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet Housing Quality Standards.
- Tenant-Based Rental Assistance: The rental assistance agreement with the unit owner shall be terminated without further payment if:
 - The participant moves out of the unit
 - The lease terminates and is not renewed
 - The participant becomes ineligible to receive ESG/CoC rental assistance
 - Project-Based Rental Assistance [ESG only]

Payment shall only be made under the following conditions:

 - The lease has an initial term of one year
 - The rental assistance agreement covers one or more permanent housing units in the same building
 - Each unit covered by the agreement is only occupied by participants
 - Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

Re-evaluations:

Minimum standards for completing eligibility re-evaluations of individuals and families are:

Timing:

Homelessness Prevention – participants shall be re-evaluated not less than once every three months

Rapid Rehousing – participants shall be re-evaluated not less than once annually

Eligibility:

The participant shall have an annual income that is 30 percent of median family income for the area or less, as determined by HUD [ESG only]; and

The participant shall lack sufficient resources and support networks necessary to retain housing without ESG/CoC assistance.

Permanent Supportive Housing Standards

Participant Eligibility:

Eligible households include individuals with disabilities and families in which one adult or child has a disability. To be served households must also meet the definition of homelessness according to category 1 and 4. Supportive services designed to meet the needs of program participants must be made available to participants. Permanent supportive housing may be provided on a scatter site or single site basis using tenant based rental assistance, leasing or operating costs to support the operations of a supportive housing facility as well as supportive services to meet resident needs.

Order of Priority for Permanent Supportive Housing:

Order of priority in CoC program funded permanent supportive housing beds dedicated to persons experiencing chronic homelessness, and PSH beds prioritized for occupancy by persons experiencing chronic homelessness.

- The CoC shall prioritize those experiencing chronic homelessness based on the length in time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individuals or families service needs;
- Where there are no chronically homeless individuals and families within the CoC's geographic area are encouraged to follow the order of priority under 'Order of Priority in permanent supportive housing beds not dedicated or prioritized for persons experiencing chronic homelessness';
- Recipients of CoC Program-Funded PSH beds should also consider the goals and any identified target populations served by the project.
- Recipients must also practice due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance

based on their total length of time homeless and/or the severity of their needs. CoC Program-funded PSH providers are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. Chronically homeless persons shall continue to be prioritized for PSH until they are housed.

Order of priority in permanent supportive housing beds not dedicated or prioritized for persons experiencing chronic homelessness:

- First priority: homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
- Second priority: homeless individuals and families with a disability and the most severe service needs.
- Third priority: homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
- Fourth priority: homeless individuals and families with a disability coming from transitional housing.

Participant Contribution:

Individuals and families residing in permanent supportive housing are required to pay rent. Rent charges may not exceed those specified in 578.77.

Program Fees:

No fee other than rent or occupancy charges as specified above may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants