

# **WRITTEN STANDARDS FOR THE ADMINISTRATION OF COC AND ESG ASSISTANCE**

## **West Central Minnesota Continuum of Care – MN 508**

*Updated September 7, 2106*

The West Central Minnesota Continuum of Care (CoC) is responsible for coordinating and implementing a regional homeless response system to meet the needs of persons experiencing or at imminent risk of homelessness within our geographic region.

Both the Emergency Solution Grant (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Rules state that the Continuum's of Care must establish written rules for the administration of ESG and CoC assistance. All programs that receive ESG or CoC funding are required to abide by these written standards. The CoC strongly encourages programs that do not receive either of these sources of funds to accept and utilize these written standards.

The majority of these standards are based on the ESG and/or HEARTH Rules, however additional standards have been established to assist the CoC in meeting State of Minnesota funding program guidelines, support Coordinated Entry goals, enhance CoC performance outcomes, and to help the CoC reach the goal of ending homelessness in our region. This is a living document that will evolve with regional needs and funder requirements.

These written standards have been developed in consultation with CoC and ESG recipients (and with service providers to allow for input on standards, performance measures and the process for full implementation of the standards throughout the CoC from the perspective of those organizations that are directly providing homeless housing and services, Emergency Shelter(ES), Transitional Housing (TH), Permanent Supportive Housing (PSH), Rapid Re-Housing (RRH) and Supportive Service Only (SSO). Service providers were invited to attend a series of meetings to establish the standards for each component.

### **Guiding Strategies**

The CoC has established the following strategies for the use of ESG and CoC funds. Funds will be used to:

- Support Continuum of Care, Heading Home, Opening Doors, and MN Consolidated Plans.
- Foster greater and rapid access to permanent housing, including implementing Housing First, client choice and barrier free principals.
- Support stabilizing households in permanent housing once housed, utilizing harm reduction principals, linkage to mainstream resources, creative client engagement, and individualized case plans based on evidence based assessments (identifying needs, strengths, and barriers).
- Support Coordinated Entry, helping to develop a fair, rapid, coordinated, evidence based, and transparent homeless response system.
- Leverage existing resources to achieve the match and case management requirements and to avoid duplication of services.
- Support federal, regional and local goals for priority populations, including but not limited to veterans, persons with disabilities, families and others.
- Allow for updates that respond to the changing needs, population and resources in the CoC.
- Comply with eligibility and verification requirements and locally established standards (HMIS, HUD , housing status, habitability standards, homeless definitions, etc.).
- Ensure that persons experiencing homelessness in the region will be provided with an easy and consistent process to access housing and services designed for persons experiencing

- homelessness.
- Gather data vital to homeless planning to assure effective use of scarce resources and quality of care.
- Assure compliance with Federal and state funding requirements and goals.

### **ESG and CoC Program Overview**

The CoC and ESG Programs are targeted to persons who “without” these programs would become or remain homeless. The programs should provide the appropriate amount of assistance to effectively house and stabilize households, neither over nor under serving persons. Both CoC and ESG may serve singles, unaccompanied youth, and families.

1. **Emergency Solutions Grant (ESG)** is focused on housing and services for homeless and at-risk of homelessness. The program will provide temporary financial assistance, housing relocation, and stabilization services to individuals and families who are homeless, or would be homeless but for this assistance.
2. **Continuum of Care (CoC)** is focused on housing and services for literally homeless or persons fleeing abusive situations. The program will provide short-term (RRH) to permanent (PSH) housing and stabilization services to singles, families, and unaccompanied youth, who would remain homeless but for this assistance.

## **REGION-WIDE POLICIES**

### **1. Homeless Management of Information System (HMIS) Participation and Reporting**

- a) ESG and CoC recipients must assure compliance with all HUD record-keeping provisions, including use of the HMIS (with the exception of Victim Service Providers). HUD requires that ESG and CoC recipients and providers enter client-level data into an HMIS according to current HUD data standards found on the MN HMIS website or through the State System Administrator (SSA).
- b) Programs are required to keep a record of all clients that are screened and classified as ineligible. Recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive assistance, the record must include documentation of the reason for that determination.
- c) Programs required to participate in HMIS shall enter into a HMIS agreement with the SSA and adhere to other data collection, sharing or reporting agreements as required by HUD, the HMIS administrator, funder or the CoC.
- d) Victim Service Providers are prohibited from entering in HMIS, but must enter data into an equivalent data base and adhere to any funder and CoC reporting requirements.

### **2. Funding Obligations**

- a. Non-Duplication of funding: Funding from multiple ESG or CoC sources may not be used to duplicate services to a project or person.
- b. Match and leverage: Recipients are responsible for assuring the provision of required leverage and match resources. Funded organizations are required to report the sources of match and leverage annually. These resources are verified through annual review.

- c. Gage expenditures: Agencies shall run quarterly expenditure reports to assure project spending is on target -not over spent, leaving a gap in service OR underspent-leaving money on the table. CoC quarterly expenditure reports shall be submitted to the CoC within 15 days of the end of each quarter (April 15, July 15th, October 15th, January 15<sup>th</sup>).

### 3. Program Description for each Component

Program Component	Description	Essential Program Elements	Who is it appropriate for?	Eligibility Criteria
Prevention: <b>ESG</b>	Activities or programs designed to prevent the incidence of homelessness.	<ul style="list-style-type: none"> <li>• Up to 24 months of rental assistance (desired 3+ months)</li> <li>• Deposit</li> <li>• Utilities Assistance.</li> <li>• Back rent.</li> <li>• Case Management – minimum 1x monthly.</li> <li>• Housing stability plan.</li> <li>• Connection to mainstream resources.</li> </ul>	One of the following: <ul style="list-style-type: none"> <li>• Doubled Up due to economic reasons.</li> <li>• Fleeing DV.</li> <li>• Within 21 days of eviction (written notice)</li> <li>• Moved 2x in 6 month period</li> </ul>	<ul style="list-style-type: none"> <li>• Pay 30% of income.</li> <li>• Anticipation of increased earned or other income.</li> <li>• Participation in CM.</li> <li>• Apply for eligible mainstream resources.</li> </ul>
Prevention: <b>FHPAP</b>	Activities or programs designed to prevent the incidence of homelessness.	<ul style="list-style-type: none"> <li>• Short-term rent or utility subsidies to avoid eviction or utility termination;</li> <li>• Security deposits or first month's rent to help households move into a different apartment;</li> <li>• Mediation programs for landlord-tenant disputes;</li> <li>• Payments to prevent foreclosure on a home; and</li> <li>• Education and training services (financial literacy, life skills, tenant education)</li> <li>• Linkage to other services.</li> <li>• Short-term light case management.</li> </ul>	One of the following: <ul style="list-style-type: none"> <li>• Doubled Up due to economic reasons.</li> <li>• Fleeing DV.</li> <li>• Within 21 days of eviction (written notice)</li> <li>• Moved 2x in 6 month period</li> </ul>	<ul style="list-style-type: none"> <li>• Pay 30% of income.</li> <li>• Anticipation of increased earned or other income.</li> <li>• Participation in CM.</li> <li>• Apply for eligible mainstream resources.</li> </ul>
Emergency Shelter	Facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless. Includes linkage to service. Short-term intervention with ongoing assessment based on	<ul style="list-style-type: none"> <li>• Case Management 1x/week (barriers assessment, money management, goal setting, ongoing assessment)</li> <li>• Referral for mainstream services (MH, Medical, Housing, Transportation, Employment, training, Social Service, Child Care, CDO)</li> <li>• Transportation Assistance</li> <li>• Showers</li> <li>• Laundry</li> <li>• On-site Meals</li> <li>• Telephone &amp; internet access</li> <li>• Safe sleeping</li> <li>• Diversion</li> </ul>	Anyone seeking shelter known to be without safe and secure overnight sleeping accommodations. Meet HUD definition of literally homeless Below Poverty Level Victim of Domestic Violence	<ul style="list-style-type: none"> <li>• No Drug/Alcohol on premises</li> <li>• HUD or MN Homeless</li> <li>• No other supports (DV) or insufficient resources to secure housing.</li> <li>• 30 days w/ up to 60 days.</li> <li>• Required to look for housing.</li> <li>• Required to look for employment or</li> </ul>

	progress. Ideally less than 45 days.			increase income dependent on length of stay or barriers.
Motel Voucher	Temporary housing or shelter and support for persons escaping violent or abusive situations. Includes linkage to services.	<ul style="list-style-type: none"> <li>• Voucher for motel or hotel.</li> <li>• Referrals to mainstream resources.</li> <li>• Diversion</li> <li>• Access to showers.</li> <li>• Provision or referral for meal.</li> </ul>	Any seeking shelter known to be without safe and secure overnight sleeping accommodations and cannot access or are not eligible for emergency shelter.	<ul style="list-style-type: none"> <li>• HUD or MN Homeless</li> <li>• No other supports (DV) or insufficient resources to secure housing.</li> </ul>
Domestic Violence Shelter	Temporary housing or shelter and support for persons escaping violent or abusive situations. Includes linkage to services.	<ul style="list-style-type: none"> <li>• Short term Crisis shelter</li> <li>• 1-3 nights Hotel voucher when a shelter bed is not available or appropriate and when funding is available.</li> <li>• DV related Advocacy and supportive services.</li> <li>• Referral and arrangement for transportation to other shelters.</li> <li>• Meals.</li> <li>• Personal hygiene and clothing (emergency care items).</li> <li>• Individual and group support</li> <li>• Linkage to housing and mainstream services.</li> </ul>	Persons seeking immediate shelter from violent or abusive situations.	<ul style="list-style-type: none"> <li>• Victim of DV.</li> <li>• 18 years or older.</li> </ul>
Transitional Housing	Facilitates the movement of homeless individuals and families to permanent housing. Homeless persons may live in transitional housing for up to 24 months and receive supportive services such as childcare, job training, and home furnishings that help them live more independently.	<ul style="list-style-type: none"> <li>• Rental assistance up to 24 months.</li> <li>• Case management- changes in frequency and intensity determined by individual needs. Recommend starting more frequently as least every two weeks initially.</li> <li>• Utility assistance.</li> <li>• Pay 30% of income to towards housing unless special circumstances exist.</li> <li>• Link to mainstream resources , youth services, child care, education, parenting, senior services, and skill building</li> <li>• Continuum of services: scattered site, congregate, room/board.</li> <li>• Financial Literacy or budgeting</li> <li>• Apply for public housing or other housing opportunities</li> </ul>	Individuals with low to moderate exiting homelessness and entering permanent or transitional housing services. <ul style="list-style-type: none"> <li>• Homeless exiting shelter.</li> <li>• Persons who will be successful w/ short-term help.</li> <li>• Capacity to increase income (earned or other cash income), skills</li> <li>• Persons who can't afford housing w/income until access public housing assistance.</li> </ul>	<ul style="list-style-type: none"> <li>• Ages 16+</li> <li>• Homeless or eviction notice</li> <li>• Exiting jail or tx with no housing options</li> <li>• Participate in CM</li> <li>• Housing stability plan (self-directed) that addresses barriers.</li> </ul>

			<ul style="list-style-type: none"> <li>• Youth w/ or working towards GED or HS diploma,</li> <li>• Youth exiting foster care.</li> <li>• Persons exiting TX.</li> <li>• Persons fleeing DV</li> </ul>	
Rapid Re-housing – federally funded	Housing and related supportive services for people moving from homelessness to independent living. Housing and services are limited to 24 months. Linkage to other mainstream services.	<ul style="list-style-type: none"> <li>• Short-term to medium-term rent or utility subsidies to obtain and maintain housing;</li> <li>• Security deposits or first month's rent to help homeless households move to an apartment;</li> <li>• Mediation/Advocacy programs for landlord-tenant disputes;</li> <li>• Education and training services (financial literacy, life skills, tenant education)</li> <li>• Financial assistance for basic needs or employment/education/transportation.</li> <li>• Linkage to other services.</li> <li>• Case management.</li> </ul>	Individuals with low to moderate barriers exiting homelessness and who have a strong chance of increasing their income and stabilizing their housing with short (2 month-6 months) to medium (7-12 months) length support.	
Rapid Rehousing – State funded	Housing and related supportive services for people moving from homelessness to independent living or to prevent literal homelessness. Housing and services are limited to 24 months. Linkage to other mainstream services.	<ul style="list-style-type: none"> <li>• Short-term to medium-term rent or utility subsidies to obtain and maintain housing;</li> <li>• Security deposits or first month's rent to help homeless households move to an apartment;</li> <li>• Mediation/Advocacy programs for landlord-tenant disputes;</li> <li>• Education and training services (financial literacy, life skills, tenant education)</li> <li>• Financial assistance for basic needs or employment/education/transportation.</li> <li>• Linkage to other services.</li> <li>• Case management</li> </ul>	Individuals with low to moderate barriers exiting homelessness and who have a strong chance of increasing their income and stabilizing their housing with short (2 month-6 months) to medium (7-12 months) length support. -Overcrowded or at risk of eviction (due to overcrowding)	<ul style="list-style-type: none"> <li>• 200% poverty or less (FHPAP)</li> <li>• 30% of medium (OEO)</li> <li>•</li> </ul>
Long-term Homeless	Long-term housing with or without supportive services for homeless persons who have not had a	<ul style="list-style-type: none"> <li>• Support services</li> <li>• Case management – as applicable, with intensity adjusted for stability, client choice and availability.</li> <li>• Linkage to mainstream and community resources</li> <li>• Voluntary participation</li> <li>• Rental assistance</li> <li>• Deposit</li> </ul>	Individuals who lack a permanent place to live continuously for a year or more or at least four times in the past three years. Any period of	<ul style="list-style-type: none"> <li>• MN Long-term Homeless eligibility.</li> </ul>

	permanent place to live.		institutionalization or incarceration shall be excluded when determining the length of time a household has been homeless.	
Permanent Supportive Housing	Long-term housing with supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting.	<ul style="list-style-type: none"> <li>• Support services</li> <li>• Case management – with intensity adjusted for stability, client choice and availability.</li> <li>• Confirmation of residency – quarterly.</li> <li>• Linkage to mainstream and community resources</li> <li>• Other direct assistance (child care, transportation, utility assistance.)</li> <li>• Voluntary participation</li> <li>• Rental assistance</li> <li>• Deposit</li> </ul>	Individuals with high barriers and/or a verifiable disability (HUD only) who are exiting homelessness or transitional housing services.	<ul style="list-style-type: none"> <li>• HUD Homeless (CoC programs) or MN LTH eligible (LTH vouchers)</li> <li>• Income eligibility as defined by funding source.</li> </ul>
Permanent Supportive Housing: Chronic	Long-term housing with supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting.	<ul style="list-style-type: none"> <li>• Support services</li> <li>• Case management – define frequency</li> <li>• Confirmation of residency – quarterly.</li> <li>• Linkage to mainstream and community resources</li> <li>• Other direct assistance (child care, transportation, utility assistance.)</li> <li>• Voluntary participation</li> <li>• Rental assistance</li> <li>• Deposit</li> </ul>	Homeless families, youth, individuals with very high barriers who have a disability and have been homeless one year or experienced at least 4 episodes of homelessness in the past 3 years, given the combined episodes total 12 months.	<ul style="list-style-type: none"> <li>• HUD Homeless</li> <li>• Verifiable disability</li> <li>• Homelessness for 1 year or have had 4 episodes in the past 3 years – with episodes totaling 12 months.</li> </ul>

### SERVICE PRIORITIZATION & TARGETING

The Continuum recognizes that the demand for services outweighs existing resources; that some households entering homelessness can be diverted from ever needing to enter shelter; and that some entering shelter can resolve their housing crisis independent of further homeless supports.

Furthermore, the Continuum understands that linking individuals with the right level of housing and services is not only essential to their success in the program, but is the most efficient use of regional resources. Service prioritization is there for essential to maximize existing resources, focusing on those that are least likely to succeed without intervention and supports.

4. **Program Type Referral Criteria** The VI-SPDAT is utilized to help target households to the appropriate housing component, however, provider expertise, program availability, program eligibility, and client choice also need to be considered when making referrals. If referrals are made or accepted outside of recommended range, agency must be able to document exception. Also note, when filling units, the agency must utilize the CoC Prioritization Criteria.

Program Referral Criteria for each Component	VI-SPDAT Score Range		
	Families	Single Adults	Youth
<b>Referral to Mainstream Resources and Self-Resolve Strategies</b>			
Client able to address housing barriers with individual resources and/or available community-based resources.	0-3	0-3	0-3
<b>Referral to Prevention Services</b>			
<ul style="list-style-type: none"> <li>• Doubled Up due to economic reasons.</li> <li>• Fleeing violence or abuse</li> <li>• Within 21 days of eviction (written notice)</li> <li>• Moved 2x in 6 month period due to financial reasons</li> </ul>	0-3	0-3	0-3
<b>Emergency Shelter (ES) including motel vouchers</b>			
<ul style="list-style-type: none"> <li>• Literally homeless</li> <li>• Fleeing/attempting to flee DV and/or family violence</li> </ul>	N/A	N/A	N/A
<b>Rapid-Rehousing (RRH)</b>			
<ul style="list-style-type: none"> <li>• State RRH can be used as a bridge to permanent subsidy</li> </ul>	4-8	4-7	4-7
<b>Transitional Housing (TH)</b>			
<ul style="list-style-type: none"> <li>• Life Transition Issue (at least one of the attributes below): <ul style="list-style-type: none"> <li>○ Youth (ages 15-24)</li> <li>○ Youth parents</li> <li>○ Domestic Violence Survivor</li> <li>○ Persons released from correctional facilities</li> <li>○ Pregnant women</li> <li>○ Persons in early stages of AOD addiction recovery</li> <li>○ Veterans (choosing Grant and Per Diem – GPD)</li> </ul> </li> </ul>	4-8	4-7	4-7
<b>Long-term Homeless (LTH)</b>			
<ul style="list-style-type: none"> <li>• Meet state LTH definition and/or GRH LTH definition</li> </ul>	4+	4+	4+
<b>Permanent Supportive Housing (PSH)</b>			
<ul style="list-style-type: none"> <li>• Documented disability</li> <li>• Meet HUD definition of Homeless at entry.</li> </ul>	9+	8+	8+
<b>Chronic Permanent Supportive Housing (PSH – Chronic)</b>			
<ul style="list-style-type: none"> <li>• Documented disability</li> <li>• Homeless for at least 12 consecutive months or have a 4 episodes of homelessness in the past 3 years for a total of 12 months.</li> </ul>	12+	10+	10+

Notes:

1. Refer household to TH if the household meets both the income thresholds (ESG) and at least one of life transition issues listed above.
2. Households eligible for both RRH and TH may choose which service strategy they prefer.
3. If the household scores for a TH or RRH service strategy but does not meet the specific programmatic criteria (either income or life transition issues) for either TH or RRH, the

household is recommended for an alternative service strategy to facilitate the client's/household's housing exit.

## 5. Determining & Prioritizing Resources

All ESG and CoC funded Transitional, Rapid-Rehousing and Permanent Supportive programs must adhere to the following criteria for determining eligibility and prioritizing resources. Programs are required to determine and document eligibility and priority status. Often third party supporting documentation is required. Verification and documentation requirements can be found on the CoC website. While some non-ESG and CoC programs do not have specific income or homeless verification criteria, the CoC requires that ALL participants lack appropriate housing options, sufficient resources and support networks to obtain or retain housing. The CoC has established a Coordinated Entry Prioritization Policy to guide projects in filling vacant units/vouchers.

A. Integration of Policies: Projects must incorporate the following to assure adherence to the policy:

- 1) Establish and updated eligibility criteria in the regional Coordinated Assessment System.
- 2) Select household in the order of priority when filling all units/vouchers. Note: PSH projects must select Chronic Homeless Households first, but do not need to keep beds open when no Chronic Homeless persons are available on the priority list.
- 3) Edit program eligibility guidelines and policies as necessary to assure they are not in conflict with Prioritization Policies.

B. Special Prioritization Criteria:

- Chronic homeless prioritization: While the West Central MN Continuum of Care feels all persons who become homeless need and deserve a home, the continuum feels priority should be given to those individuals who are both homeless and disabled with the longest length of time homeless, as they are at greatest risk for remaining homeless. All CoC Permanent Supportive homeless providers must follow the CoC prioritization policy.
- Veterans Preference: Veteran households who do not qualify for other Veterans benefits, housing or services will be given preference for homeless supportive housing units, with all other eligibility and preference criteria being equal.

## 6. ELIGIBILITY

A. Income Eligibility- All assistance provided through ESG and CoC Programs must benefit households who have an annual income of below 30 percent of median household income for the area based on household size, and as updated annually by HUD (with the exception of those who are currently homeless by HUD definition, but must be within 30 percent at 1-year certification). The most recent table of income limits is available at:

<http://www.huduser.org/datasets/il.html>.

The following rules and requirements apply in determining income eligibility;

1. ESG regulations require that income of all qualifying household members may be included in the determination of income, as may be applicable. The applicant's income



- must not exceed 30% of the Housing Area Median Family Income (HAMFI).
2. The ESG or CoC program staff must verify that the applicant’s income meets low income criteria within thirty (30) days prior to entering ESG or CoC funded programs (excluding Emergency Shelter).
  3. Staff must consider anticipated income to determine affordability prior to placing in scattered site housing where participants must transition in place.
  4. ESG and CoC recipients (excluding Emergency Shelter) must determine eligibility by examining, verifying, and/or updated, as necessary, source documents and documenting in the client file, preferably through HMIS. Examples of documentation include; Last 30 days of payment stubs, self-employment profit/loss statement, agency statements (Social Security Benefits, Disability Benefits, Unemployment Compensation, Retirement Funds, Pension, Workman’s Compensation, Child Support) or other applicable proof of income.
  5. If the individual has no income or is paid in cash and has no way of obtaining income verification form the source, then a Declaration of Income form may be used, but only as a last measure.

CATEGORIES	HEARTH ACT HOMELESS DEFINITIONS	ELIGIBLE PROGRAMS
1. Literally Homeless	<p>An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>• Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, including               <ul style="list-style-type: none"> <li>- A car</li> <li>- A bus or train station</li> <li>- A park</li> <li>- An airport</li> <li>- An abandoned building</li> <li>- A camping ground</li> </ul> </li> <li>• Living in a shelter designated to provide temporary living arrangements, including               <ul style="list-style-type: none"> <li>- Congregate shelters</li> <li>- Shelters for families, singles, youth, or those fleeing domestic abuse, etc.</li> <li>- Transitional housing (per NOFA restrictions, must have entered transitional housing from streets or shelter)</li> <li>- Hotels and motels paid for by charitable organizations or federal/state/local government programs</li> </ul> </li> <li>• Exiting an institution (e.g., jail, treatment, hospital)               <ul style="list-style-type: none"> <li>- where they resided for <b>90 days or less</b> AND</li> <li>- were residing in <b>emergency shelter or place not meant for human habitation</b> immediately before entering institution.</li> </ul> </li> </ul>	PH, TH, SSO
2. Imminently Homeless (with/in 14 days)	<p>Individuals and Families:</p> <ul style="list-style-type: none"> <li>• Will lose their primary nighttime residence within <b>14 days</b> of the date of application for homeless assistance AND</li> <li>• No subsequent residence has been found AND</li> <li>• The household lacks the resources or support networks (friends, family, faith orgs, or other social networks that are safe) to obtain other permanent housing</li> <li>• Primary nighttime residences include:               <ul style="list-style-type: none"> <li>• Housing the individual/family                   <ul style="list-style-type: none"> <li>• Owns</li> <li>• Rents</li> <li>• Shares with others without paying rent</li> </ul> </li> <li>• Rooms in hotels/motels that are paid for by the household seeking assistance</li> </ul> </li> <li>• Households who are losing their housing due to lease violations, but meet the other requirements of category two, qualify as homeless under this definition</li> </ul>	TH, SSO (NOT PH)

**Chronically Homeless Individual** - An individual who:

- A. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- B. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 1 year or on at least four separate occasions in the last 3 years where the combined length of time homeless in those occasions is at least 12 months; and
- C. Has a disability.

**Chronically Homeless Family with Children** – A family with children with an adult head of household (or if there is no adult in the family with children, a minor head of household) who meets all of the criteria for a chronically homeless individual, including a family with children whose composition has fluctuated while the head of household has been homeless.

**Note:**

- (1) For the purposes of reporting, a chronically homeless family with children must consist of at least one child under the age of 18.

**Disability** – An individual with one or more of the following conditions:

- A. A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that:
  - (1) Is expected to be long-continuing or of indefinite duration;
  - (2) Substantially impedes the individual's ability to live independently; and
  - (3) Could be improved by the provision of more suitable housing conditions.
- B. A developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or
- C. The disease of acquired immunodeficiency syndrome (AIDS) or any condition arising from the etiologic agency for acquired immunodeficiency syndrome (HIV).

**Households Experiencing Long-Term Homelessness (Minnesota):** Persons including individuals, unaccompanied youth, or families with children who lack a permanent place to live continuously for a year or more or at least four times in the past three years. Any period of institutionalization or incarceration shall be excluded when determining the length of time a household has been homeless.

ξ **Doubled Up/Couch Hopping:** Doubled up or couch hopping is considered an episode of homelessness if a household is doubled up with another household (and duration is less than one year) or couch hops as a temporary way to avoid living on the streets or an emergency shelter. **Transitional Housing:** Time spent in transitional housing (TH) is a neutral event. Housing history prior to or after transitional housing should be evaluated to determine if it meets the state's LTH definition. For example, if a household was homeless 8 months prior to entering TH and 4 months after existing TH, the household would meet the LTH definition.

Note: Minnesota's definition does not require that the person have a disabling condition.

## 7. Recertification

- **RRH-** 365 Day Re-certifications includes determination that the household is: 1). below 30% AMI. 2). Remains at-risk of homelessness 3). Lacks the financial resources and support networks needed to remain in their housing. Conduct a 30-day check-in for continued eligibility for housing subsidy.
- **TH-** 365 Day Re-certifications includes determination that the household is: 1). below 30% AMI. 2). Remains at-risk of homelessness 3). Lacks the financial resources and support networks needed to remain in their housing. Conduct a 90-day check-in for continued eligibility for housing subsidy.

- PSH Annual Re-certifications includes determination that the household: 1) Remains at-risk of homelessness and 2) Lacks the financial resources and support networks needed to remain in their *housing*
- CH PSH Annual Re-certifications includes determination that the household: 1) Remains at-risk of homelessness; and 2) Lacks the financial resources and support networks needed to remain in their housing.

## 8. Coordinated Entry

- a. No side doors: All CoC and ESG beds must be filled through the West Central CoC Coordinated Entry System (CES) approved process.
  - b. Uniform process & tools: Programs must utilize the approved CES tools, prioritization and referral processes to assure process is fair, consistent and transparent for all persons.
  - c. Assessments:
    - i. Diversion: Households seeking assistance will first be assessed for diversion to mainstream services prior to entry into the homeless response system utilizing the CoC Triage Assessment.
    - ii. Prevention: If the Triage Assessment determines light assistance is needed to resolve the households housing crisis, the CoC Prevention Screen is completed to prioritize for prevention assistance.
    - iii. Homeless Housing: If the previous assessments determine mainstream or prevention services will not prevent or end the household's homelessness, a Housing Crisis Assessment is completed (utilizing the VI-SPDAT tools) to determine the most appropriate linkage to homeless dedicated program beds. Households are then prioritized according to score, eligibility and CoC preference.
  - d. Denials: Denials of services must be limited to ineligibility and conflict of interest and be documented to assure barrier free access and transparent eligibility requirements.
9. **Low barrier policy** CoC providers will make enrollment determinations on the basis of limiting barriers to enrollment in services and housing. No client may be turned away from crisis response services or homeless designated housing due to lack of income, lack of employment, disability status, or substance use unless the project's primary funder requires the exclusion or a previously existing and documented neighborhood covenant/good neighbor agreement has explicitly limited enrollment to clients with a specific set of attributes or characteristics. Funders restricting access to projects based on specific client attributes or characteristics will need to provide documentation to the CoC providing a justification for their enrollment policy. CoC projects offering Prevention and/or Short-Term Rapid Rehousing assistance (i.e. 0 – 6 months of financial assistance) may choose to apply some income standards for their enrollment determinations.

10. **Family Separation Policy**: The West Central MN Continuum of Care believes that families experiencing homelessness should not be separated unless the health and well-being of children are at immediate risk. In addition, a broad definition of family should be used that allows for female headed, male-headed, two parent, same sex parent, LGBT parent, and extended families to be served together with their children. (full policy found in CoC Governance Charter)

## **11. COORDINATION OF SERVICES**

Good coordination of services is essential to a client centric model, most effective use of resources, effective Coordinated Entry System (CES), and improved outcomes. Agencies receiving ESG and CoC funds must work collaboratively with household members and other providers to plan and link to resources that will help house and stabilize their consumers. ESG and CoC funds may be used in the coordination of services. Component services include:

- a) Utilizing CES to access, screen, assess and link household applying for services to homeless prevention, emergency shelter, transitional housing, rapid-rehousing, and permanent supportive housing.;
- b) Advocating on behalf of individuals/families in accessing all services they are eligible to receive.
- c) Units must be filled through Coordinated entry;
- d) Working with households to create a housing stability or independent living plan;
- e) Helping participant's access services by providing assistance and/or coordinating transportation to attend service appointments;
- f) Prioritizing enrollment in mainstream resources;
- g) Updating assessments and eligibility information into HMIS and/or CES (in interim) to assure appropriate, timely and accurate linkage to housing and services;
- h) Children must be connected with school liaison for prompt enrollment per CoC policy;
- i) Monitoring and evaluating program participant progress;
- j) Following-up on CES Referrals and requests for information in a timely manner;
- k) Updating household intake, exit and status changes in HMIS; and
- l) Following up with households 6 month after exit to inquire on housing stability and need for further linkage to service (Excluding Emergency Shelter and Outreach Services).

## **12. COORDINATION OF SERVICES**

Good coordination of services is essential to a client centric model, most effective use of resources, effective Coordinated Assessment system, and improved outcomes. Agencies receiving ESG and CoC funds must work collaboratively with household members and other providers to plan and link to resources that will help house and stabilize their consumers. ESG and CoC funds may be used in the coordination of services. Component services include:

1. Utilize CARES to access, screen, assess and link household applying for services to homeless prevention, emergency shelter, transitional housing, rapid-rehousing, and permanent supportive housing, allowing no side door or separate entrance into these programs;
2. Advocate on behalf of individuals/families in accessing all services they are eligible to receive.
3. Work with households to create a housing stability or independent living plan;
4. Help participant's access services by funding, if applicable, transportation assistance to attend service appointments;
5. Prioritize enrollment in mainstream resources;

6. Update eligibility and availability information into HMIS and/or CARES to assure appropriate, timely and accurate linkage to services;
7. Connect school age children with school liaison for prompt enrollment per CoC policy;
8. Monitor and evaluating program participant progress, working with client to align goals from all service agencies;
9. Follow-up on CARES Referrals and requests for information in a timely manner;
10. Update household intake, exit and status changes in HMIS; and
11. Follow up with household after exit to inquire on housing stability and need for further linkage to service (Excluding Emergency Shelter).

**ADDEMDUM A**

**West Central Prioritization Policy**

Updated August 2016

The West Central MN Continuum of Care utilizes a single prioritization list for Coordinated Entry. The single prioritization list applies to the entire geographic region, all populations/subpopulations and must be utilized to fill all dedicated homeless Transitional Housing, Rapid-Rehousing, Long-term Homeless and Permanent Supportive Housing units/vouchers.

Prioritization is utilized for all dedicated supportive housing programs to help strategically and fairly target available resources, better assuring that those who are most vulnerable receive housing more rapidly than those with who are less vulnerable.

Homelink is used for Prioritization. If you currently are not invited to Homelink, please contact Cody Schuler, the CARES Coordinator, for information on completing the required training.

**STEPS:**

**1. Select Program Category:**

- Select all households within the appropriate VI-SPDAT score range for your Program Category.

Program Category	Singles	Families	Youth
Mainstream/Prevention	0-3	0-3	0-3
Transitional/Rapid RH/LTH (Housing only)	4-7	4-8	4-7
PSH/LTH	8+	9+	8+

Note: Those scoring in Mainstream/Prevention range should not be on the Priority list and should not be prioritized for TH, RRH, PSH or LTH units/vouchers.

**2. Sort Specific Funder Requirements or Special Populations (if applicable):**

- Sort & filter households who meet specific program criteria as defined by the CoC System Mapping (Veterans, Domestic Violence, Youth, Singles or Families, Tribal Enrollment).

**3. Prioritize Order by Vulnerability:** Within each score category, households will be selected in the following order:

- **Permanent Supportive Housing:**
  - i. Chronic Homeless with:
    1. Highest VI-SPDAT Score (highest service needs), disability and longest period of homelessness and in the following order, coming from:
      - a. Unsheltered
      - b. Emergency shelter
      - c. Transitional housing
    2. Highest VI-SPDAT Score (highest service needs), disability and in the following order, coming from:
      - a. unsheltered
      - b. emergency shelter
      - c. transitional housing
  - ii. Disabled w/ Highest VI-SPDAT score, and longest period of homelessness in the following order, and coming from:
    1. Unsheltered
    2. Emergency shelter
    3. Transitional Housing

iii. Highest VI-SPDAT score and longest period of homelessness in the following order, and coming from:

1. Unsheltered
2. Emergency Shelter
3. Transitional Housing

- **Rapid Rehousing Programs/Long-term Homeless and Transitional Housing:**

i. Highest VI-SPDAT Score and coming from:

1. Unsheltered
2. Emergency Shelter
3. Transitional Housing

4. **Handling Ties:** If two or more persons/households have equal vulnerability scores/criteria a full SPDAT is recommended.

- **Tri-morbidity** - as defined by VI-SPDAT)
- **Age** - youth (under 26) or senior (55 and older)
- **Length of Time Homeless**

5. **Verification of Eligibility:** Projects are required to keep documentation eligibility.

6. **Offer to Client**

- Client choice should be provided when available and applicable (provided eligibility and prioritization criteria is met).
- Client choice includes household choice on: location, housing type, fixed vs. scattered, and program type (RRH vs TH, LTH vs PSH) when applicable.

7. **Providers Right to Refusal**

- Providers maintain the right to refuse a client if there has been past documented incidents working with that client where there was potential harm to the service provider or if there is documented conflict of interest (provider is relative of client, there is a lawsuit pending against client/agency)
- If a client was unsuccessful, was evicted, or there is rent owed provider, providers should not automatically deny clients. Providers should first work with clients to assist with negative balances and prevent similar incidences in the future.
- Provider is unable to financially provide services in clients desired location.
- Providers refusing clients must complete the West Central CES Denial Form and submit to the CoC Coordinator within 3 days of refusal.

## **ADDEMDUM B**

### **EDUCATION AND FAMILY STABILIZATION**

1. Education: The CoC adopted a policy (see CoC website) requiring all projects to assure school age children are linked to the local school liaison to ensure rapid enrollment (within 3 days) and access to other McKinney-Vento services.
2. Family Stabilization: The West Central MN Continuum of Care has established a policy assuring that families experiencing homelessness should not be separated unless the health and well-being of children are at immediate risk. In addition, a broad definition of family should be used that allows for female headed, male-headed, two parent, same sex parent, LGBT parent, and extended families to be served together with their children.

## **APPENDIX C**

### **West Central CoC Policy Requiring School Enrollment and Connection to Appropriate Services for All Children**

Approved February 2012

Educational and supportive service needs of families with minor children will be fully assessed with expediency upon entry to the program. School-aged youth will be enrolled in school immediately, working collaboratively with the designated school homeless liaison in the Local Educational Agency (LEA) to ensure that all educational assessments are completed. To the extent feasible, students in homeless situations should be kept in their school of origin (defined as the school the student attended when permanently housed or the school in which the student was last enrolled), unless it is against the parent's or guardian's wishes. Students in homeless situations must have access to the educational and other services they need to ensure that they have an opportunity to meet the same challenging state student academic achievement standards to which all students are held. Appropriate referrals will be made in the community to address supportive service needs of all family members.



## APPENDIX D

### Family Separation and Emergency Shelter and Transitional Housing

Approved November 2015

The West Central MN Continuum of Care believes that families experiencing homelessness should not be separated unless the health and well-being of children are at immediate risk. In addition, a broad definition of family should be used that allows for female headed, male-headed, two parent, same sex parent, LGBT parent, and extended families to be served together with their children. HUD issued regulations that all ESG funded shelters and transitional housing programs are prohibited from denying access to families based on the age of child. Non-compliance may result in the removal of ESG funds. The CoC has expanded this policy to include any shelter or TH program participating in CES. Specific details include:

13. IN GENERAL.—... any project sponsor receiving funds under this title to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18 shall not deny admission to any family based on the age of any child under age 18. “
14. EXCEPTION.—Notwithstanding the requirement under subsection (a), project sponsors of transitional housing receiving funds under this title may target transitional housing resources to families with children of a specific age only if the project sponsor— “(1) operates a transitional housing program that has a primary purpose of implementing an evidence-based practice that requires that housing units be targeted to families with children in a specific age group; and “(2) provides such assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured

#### Trauma and Separation

We acknowledge that people who are homeless have experienced high rates of traumatic events leading to their homelessness or because of their homelessness. Therefore, we do not want to add to the familie’s trauma by asking parents to separate from their children, and children from their parents while in the midst of a housing crisis that has already rocked the family.

#### ESG Interim Rule language on family separation:

HUD regulation includes: “(b) Prohibition against involuntary family separation. The age, of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.”

## APPENDIX E

### WEST CENTRAL MN CONTINUUM OF CARE HOMELESS TO HOUSED TASK FORCE MEMBERSHIP AGREEMENT

**Whereas**, the Homeless to Housed Task Force requires active, diverse, and region-wide participation to effectively prepare and carry-out a Region-wide Continuum of Care Plan;

**Whereas**, the Homeless to Housed Task Force desires participation from members who are interested and willing to commit to supporting the Task Force in a professional and active manner; and

**Whereas**, \_\_\_\_\_ (*insert agency name*), is willing and interested in becoming a Member of the Homeless to Housed Task Force.

**Therefore, the above named Member Agency/Organization agrees to become a Member of the Homeless to Housed Task Force, understanding and agreeing to the following membership polices and the organizational code of conduct.**

#### **I. Membership Policies:**

- A. Each Member Agency/Organization shall appoint one (1) individual to serve as a Member Representative on the Homeless to Housed Task Force and one standing Committee;
- B. Additional agency staff, administration, or board members are invited to attend Task Force meetings and participate on committees;
- C. Member Agencies are expected to strive for 100% attendance at all scheduled Task Force and chosen Standing Committee Meetings/Activities;
- D. If a representative is unable to attend a scheduled Task Force or Committee Meeting, an alternative representative should be appointed to attend in the member representatives' absence;
- E. At each meeting, voting rights shall be given to only one (1) representative from each member agency;
- F. Member Agencies without consistent representation (missing 3 or more meetings annually), will forfeit voting privileges for that year;
- G. Representatives should come to each meeting prepared to actively participate;
- H. All members are expected to abide by the Homeless to Housed Code of Conduct while participating in organizational meetings or representing the Task Force;
- I. Member Agencies are responsible for notifying the Homeless to Housed Coordinator of any changes in contact information for their agency or of their Member Representative.

#### **II. Obligations:**

1. Members should strive to represent in a fair, honest and respectful manner their individual agencies and the homeless individuals and families that they are here to represent.
2. Members should be informed on the purpose of the HTH and its role in the CoC process.
3. Members should strive to stay up-to-date on HTH strategies and planning.
4. Members should strive to keep their promises and to avoid unwise or unclear commitments that they are unable to fulfill.

5. Members are expected to uphold professional standards of conduct, exhibiting respectfulness, fairness, and honesty.
6. Members should clarify their professional roles and obligations, exercise reasonable judgment, and take precautions to ensure that any potential biases or conflicts of interest do not unjustly affect the CoC process or other members of the HTH.
7. When conflicts occur among members, they should attempt to resolve these conflicts in a responsible fashion.
8. Leaders have the extra responsibility of setting an example by their personal performance and attitude that convey honest, respectful, and ethical values.
9. Members should consult with, refer to, or cooperate with other professionals and institutions to the extent needed to serve the best interests of those they represent.

***As a member of the West Central Minnesota Homeless To Housed Task Force and/or affiliated committee, I agree to represent myself, my agency, my county, my region, and/or my state in a professional manner by adhering to the guidelines laid out in the Code of Conduct of the Homeless to Housed Task Force.***

\_\_\_\_\_ *Homeless To Housed Task Force Individual Member/Agency Member*

\_\_\_\_\_ *Date*

The following individual(s) have been assigned to serve as Member Representatives:

Name	Title/Position	Address	Phone/Email	Committee <i>(circle choice)</i>	Counties Represented <i>(circle all that apply)</i>
				Grant Membership Bylaws Data Collection	Becker Clay Douglas Grant Otter Tail Stevens Pope Traverse Wilkin
				Grant Membership Bylaws Data Collection	Becker Clay Douglas Grant Otter Tail Stevens Pope Traverse Wilkin
				Grant Membership Bylaws Data Collection	Becker Clay Douglas Grant Otter Tail Stevens Pope Traverse Wilkin

## **II. Code of Conduct for the Homeless to Housed Task Force**

Commitment and Professionalism are vital to creating and maintaining an effective and efficient Continuum of Care (CoC) process that will benefit each member of the Homeless to Housed Task Force (HTH) and the homeless men, women and children they represent. Both are integral to creating and sustaining a strong continuum in which collaboration and services can grow.

### **A. Conduct Obligations:**

1. Members should strive to represent in a fair, honest and respectful manner their individual agencies and the homeless individuals and families that they are here to represent.
2. Members should be informed on the purpose of the HTH and its role in the CoC process.
3. Members should strive to stay up-to-date on HTH strategies and planning.

4. Members should strive to keep their promises and to avoid unwise or unclear commitments that they are unable to fulfill.
5. Members are expected to uphold professional standards of conduct, exhibiting respectfulness, fairness, and honesty.
6. Members should clarify their professional roles and obligations, exercise reasonable judgment, and take precautions to ensure that any potential biases or conflicts of interest do not unjustly affect the CoC process or other members of the HTH.
7. When conflicts occur among members, they should attempt to resolve these conflicts in a responsible fashion.
8. Leaders have the extra responsibility of setting an example by their personal performance and attitude that convey honest, respectful, and ethical values.
9. Members should consult with, refer to, or cooperate with other professionals and institutions to the extent needed to serve the best interests of those they represent.

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*Signature of Member Agency/Organization Authorized Representative*

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*Date*





