

## Western Pennsylvania Continuum of Care (PA-601)



### CoC Prioritization of Chronically Homeless in all CoC-funded Permanent Supportive Housing projects

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Date Adopted: SW 1/27/2014, NW 10/9/2014, Date Revised: SW 3/28/14  
Date Implemented: SW 7/01/2014, NW 1/01/2015, Updated: NW 3/12/2015  
Merged and updated the SW and NW Policies; adoption by the CoC 10/01/2015  
Updated: 10/5/16 (HUD CPD Notice 14-012 updated to CPD Notice 16-11)

#### **Policy:**

The PA-601 Continuum of Care commits to prioritization of households who meet the HUD definition of chronically homeless in permanent supportive housing projects within the CoC, per HUD Notice CPD-16-11. This includes beds/units designated for chronically homeless and *non-chronic* designated turnover beds in permanent supportive housing projects

#### **Order of Priority:**

All Permanent Supportive Housing projects are required to prioritize Chronic Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs for all available PSH units, including those at first occupancy and made available through turnover. This updated policy requires the utilization of the below definitions from HUD Notice CPD-16-11, Section 1D:

- **Chronically Homeless.** The definition of “chronically homeless”, as stated in Definition of Chronically Homeless final rule is:
  - a) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
    - i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
    - ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

**b)** An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;

**c)** A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

- **Severity of Service Needs.** This Notice refers to persons who have been identified as having the most severe service needs.

**a)** For the purposes of this Notice, this means an individual for whom at least one of the following is true:

**i.** History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or

**ii.** Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.

**iii.** For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.

**iv.** When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

**b)** Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a).

**Additional Information:**

- In the event that two or more households have similar circumstances, an unsheltered household should be prioritized over a household in Emergency Shelter or in a Safe Haven.
- In the counties that are currently piloting Coordinated Entry, the score on the assessment tool can be used to prioritize households based on severity of service need. Counties that are not currently participating in the Coordinated Entry pilot will need to locally establish a consistent method of evaluating eligible households.

## Procedure:

When a new unit becomes available or an existing unit is ready to turnover:

- a) Using the prioritization described above, first priority is given to a chronically homeless household within the county that the project is located.
  
- b) If there are no chronically homeless households on the project's waiting list, the project will reach out to other chronically homeless in its defined service area. This will be done by notifying the Identified County Contact(s) (see Attachment A for a list of Identified County Contacts), or his/her designee, in their service area who will then distribute the information to all agencies serving chronically homeless, including, but not limited to, outreach teams, emergency shelters and other permanent supportive housing projects with chronically homeless individuals on the waiting list. The service area is the area that was defined in each individual project's funding application to HUD. It is the responsibility of each Identified County Contact to maintain an accurate distribution list for the County they represent and to redistribute this information in a timely manner. If more than one chronically homeless household is identified, use the criteria described above to identify which household will be offered the unit.
  
- c) If still no chronically homeless households are identified, the project will reach out to all counties within the RHAB to identify a chronically homeless individual/family who wants to fill the vacancy.

This outreach is done by sending an email to the Identified CoC Contact/s who will then provide all information to the list of Identified County Contacts that represent each of the counties within the region. This notification email will include the name of the program housing the chronic bed and the county in which it is located, date that the unit will be available, description of the program including eligibility criteria, final date the unit will be open to the entire RHAB, and contact information. The County Contacts will then be responsible for redistributing the information in a timely manner to the contact list for their county, including, but not limited to, outreach teams, emergency shelters and other permanent supportive housing projects with chronically homeless individuals on the waiting list. Follow the Order of Priority if more than one chronically homeless household is identified. Under this circumstance, the following conditions must be met:

- *The individual/family must meet all eligibility criteria of the program, including target population, age, gender, etc., if such criteria was identified in the project application;*
- *In order to ensure compliance with Olmstead, the individual/family must be given choice as to whether or not to accept the available bed;*
- *The referring agency must provide the project with necessary documentation to verify that the individual/family does meet the definition of chronically homeless (including proof of disability) before the final deadline stated in the originating email; and*
- *The individual/family must be assured continued access to services if the*

*individual/family will be changing counties. The referring agency will assist with application/transfer of benefits and support services if the individual/family will be changing counties.*

**d)** If no chronically homeless individual/family is identified within 7 days of the vacancy, the project can then fill the bed with the next highest priority person on the waiting list, as prioritized in the below chart.

**Summary of the Order of Priority for Non-Chronic Households in PSH**

<b>Order of Priority for Non-Chronic Households in PSH</b>	<b>Four or more episodes of homelessness?</b>	<b>12+ months of homelessness?</b>	<b>Has Severe Service Needs?</b>	<b>Other</b>
1	No	Yes	Yes	N/A
2	No	No, but still considered	Yes	N/A
3	No	No, but still considered	No	Coming from unsheltered location, Safe Haven or Emergency Shelter
4	No	No	No	Disability, coming from Transitional Housing

**e)** It is the responsibility of each program to clearly document within their files when the unit was vacated and the efforts they took to reach out to chronically homeless individuals/ families in the geographic area.

**f)** It is the responsibility of each program to complete and submit the online survey, Chronic Prioritization Turnover Unit Survey.

The form can be accessed via this link - [Chronic Prioritization Turnover Unit Survey](#)

Additional Information:

- The process to fill chronic turnover beds will continue to evolve over the next twelve months, as:
  - Coordinated Entry is fully implemented in all 20 counties;
  - The CoC develops written standards for providing assistance;
  - The CoC creates and implements a single prioritized list for PSH

## Documentation:

From Section 5 of CPD Notice 16-11, Recordkeeping Recommendations for CoCs that have Adopted the Orders of Priority in this Notice:

24 CFR 578.103(a)(4) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

**A. Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Section I.D.3. of this Notice using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.

**B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.

**C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.**

a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.

b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area -

or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

Additional Information:

CoCs and recipients of CoC Program-funded PSH must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable. See 24 C.F.R. § 5.105(a).

**Attachment A: Identified County Contacts**

**Northwest RHAB**

<b>County</b>	<b>Contact Person/Agency</b>	<b>Phone/Email Address</b>
Cameron	Sarah Grunthner, Cameron/Elk Counties B&D Programs	814-772-8016 Ext. 148 sgrunthner@cemhmr.com
Clarion	Cheryl Craft, Community Action, Inc.	814-938-3302 Ext. 215 ccraft@jccap.org
Clarion	Jennifer Krouse Clarion Department of Human Services	814-226-9280 jkrouse@co.clarion.pa.us
Clearfield	Amy Jo Rosman, Community Connections of Clearfield & Jefferson Counties	814-371-5100 Ext. 315 arosman@ccc-j.com
Crawford	Lynn McCumber, CHAPS	814-333-2924 lmcumber@chapsinc.org
Elk	Sarah Grunthner, Cameron/Elk Counties Behavioral & Developmental Programs	814-772-8016 Ext. 148 sgrunthner@cemhmr.com
Forest	Brandy Ambrose, Warren/Forest Economic Opportunity Council	814-230-7035 Ext. 3355 ambrose@wfcaa.org
Jefferson	Amy Jo Rosman, Community Connections of Clearfield & Jefferson Counties	814-371-5100 Ext. 315 arosman@ccc-j.com
Lawrence	Kathy Presnar, Lawrence County Community Action Partnership	724-658-7258 ext. 1213 kpresnar@lccap.org
Lawrence	Jennifer Malone, Lawrence County Community Action Partnership	724-658-7258 x 1218 jmalone@lccap.org
McKean	Linda Thompson, McKean County Redevelopment & Housing Authority	814-887-5563 lathompson@mckeancountypa.org
Mercer	Fran Billen, Community Counseling Center of Mercer County	724-981-6193 ext. 167 fbillen@cccmer.org
Potter	William Krog, Potter County Human Services	814-544-7315 wkrog@pottercountyhumansvcs.org
Venango	Denise Fowkes, County of Venango	814-432-9773 dfowkes@co.venango.pa.us
Warren	Brandy Ambrose, Warren/Forest Economic Opportunity Council	814-230-7035 Ext. 3355 ambrose@wfcaa.org

**Southwest RHAB**

<b>County</b>	<b>Contact Person/Agency</b>	<b>Phone/Email Address</b>
Armstrong	Chuck Richards, Armstrong County Community Action	724-548-3433 chuckri@armstrongcap.com
Butler	Allyson Rose, Butler County Human Services	724-284-5114 arose@co.butler.pa.us
Fayette	Heather Pirl, Fayette County Community Action	724-437-6050 x3216 hpirl@fccaa.org
Greene	Amy Switalski, Greene County Human Services	724-852-5276 aswitalski@co.greene.pa.us
Indiana	Marlene Meagher, Indiana County Community Action	724 -465-2657 mmeagher@ICCAP.net
Washington	Jennifer Johnson, Washington County Human Services	724-228-6995 johnsonj@co.washington.pa.us
Westmoreland	Tay Waltenbaugh, Westmoreland County Community Action	724-834-1260 twaltenbaugh@westmorelandca.org