



**WESTERN PA CONTINUUM OF CARE (PA-601)  
HOUSING COALITION OF WESTERN PA  
WRITTEN STANDARDS FOR PROVIDING ASSISTANCE**  
Approved by Western PA CoC Governing Board, February 24, 2025

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## Introduction & Background

The following written standards for providing assistance in the Western PA Continuum of Care (CoC) were developed in conjunction with CoC and Emergency Solutions Grant (ESG) recipients in order to:

- Establish community-wide expectations for the operations of projects within the CoC,
- Ensure that the system is transparent to service users and providers,
- Create consistency and coordination among projects, and
- Further the CoC's ability to meet system-wide goals

This document provides the following:

- General Standards for All Projects
- Recordkeeping Standards for All Projects
- Case Management Standards for All Projects
- Standards for Specific Project Types

The written standards were developed based on the recommendations and feedback of the CoC's Governing Board, ad hoc Written Standards Committee, Coordinated Entry (CE) Committee, Regional Homeless Advisory Board (RHABs), Homeless Action Board, Youth Action Board and general CoC membership. Best practices as shared by the National Association to End Homelessness (NAEH), US Department of Housing and Urban Development (HUD), and US Interagency Council on Homelessness (USICH) were also referenced. Several of these best practices are hyperlinked throughout the document for reference. Moreover, example templates are mentioned throughout the document and are located in the Appendices to aid in standardizing processes; however, use of these specific templates are also voluntary (unless a recipient requires subrecipients to use any templates for a more streamlined program implementation).

The CoC recognizes that not all housing programming will be aligned with the written standards from day one, which poses several opportunities:

- Project budgets and staffing can be right sized over time to better align with written standards, and/or
- Grants can be re-written in future funding cycles to better align with written standards

Projects are expected to adhere to all additional Project requirements within the HUD regulations (24 CFR Part 578<sup>1</sup> for CoC funded and 24 CFR Part 576<sup>2</sup> for ESG funded), as well as new requirements mandated by HUD and the Western PA Continuum of Care.

All CoC and ESG program staff must review and become familiar with the Written Standards and must commit to implementing the Written Standards. All new CoC and ESG program staff must review the Written Standards document and training materials (to be published on CoC website) within 60 days of hire. All CoC and ESG program staff must participate in new Written Standards training whenever new training materials are available.

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<sup>1</sup> <https://www.law.cornell.edu/cfr/text/24/part-578>

<sup>2</sup> <https://www.law.cornell.edu/cfr/text/24/part-576>

Lastly, both the CoC and ESG Interim Rules identify specific requirements for Written Standards for Projects that utilize these funds. See **Appendix A for HUD’s requirements for the Written Standards.**

## **Key Acronyms**

- BNL – By Name List
- CE/CES – Coordinated Entry/Coordinated Entry System
- CoC – Continuum of Care
- DCED – PA Department of Community and Economic Development (CoC Collaborative Applicant)
- DV – Domestic Violence
- ES - Emergency Shelter
- ESG – Emergency Solutions Grant
- HAB - Homeless Action Board
- HIC – Housing Inventory Count
- HMIS – Homeless Management Information System (HMIS)
- HP – Homeless Prevention
- HPS – Housing Problem-Solving
- HUD – U.S. Department of Housing and Urban Development
- NOFO – Notice of Funding Opportunity
- PA-601 – HUD code for the Western PA CoC
- PIT – Point in Time Count
- PSH – Permanent Supportive Housing
- PWLE – People with Lived Experience/Expertise
- RHAB – Regional Homeless Advisory Board
- RRH – Rapid Rehousing
- SO - Street Outreach
- SPM – System Performance Measures
- SSO -Supportive Services Only
- SSO-CE – Supportive Services Only Coordinated Entry
- TH – Transitional Housing
- TH-RRH – Transitional Housing Rapid Rehousing Joint Component
- YAB – Youth Action Board
- YHDP – Youth Homelessness Demonstration Program

## **GENERAL STANDARDS FOR ALL PROJECTS**

Projects must have written policies and procedures regarding Project operations and must consistently apply them to all participants. The following standards are applicable to all ESG- and CoC-funded projects in the CoC, unless otherwise stated (additional details specific to project types are in those project type sections, if applicable):

**APPLICATIONS** CoC projects should submit an annual application<sup>3</sup> for project funding to the CoC, in compliance with the CoC’s timeline, for submission to HUD. ESG projects are non-renewable and should submit applications for project funding according to DCED’s application process.

**CONFLICT OF INTEREST** CoC-funded projects must follow 24 CFR 578.95<sup>4</sup> related to conflicts of interest. ESG projects are expected to follow the conflict of interest standards outlined in 24 CFR 576.404<sup>5</sup> related to the provision of ESG assistance, and procurement of goods and services.

**COORDINATED ENTRY (CE) PARTICIPATION** All CoC-funded TH, RRH, TH-RRH, and PSH Projects; and ESG-funded RRH Projects (and any other project mandated by their funder) are required to participate in CE (also known as CES – Coordinated Entry System) in the following ways:

- Serve exclusively participants who are referred to them via the Coordinated Entry case conferencing process; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES; and
- Bring all housing openings to case conferencing; and
- Follow the CoC’s Order of Priority

ESG-funded Street Outreach projects are expected to participate in CE in the following ways:

- Provide the Access, Diversion, and Assessment phases of CES; and
- To the extent the project is funded to do so: provide the Prevention and Rapid Exit phases of CES; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES; and
- Participate in their Region’s Street outreach network, if applicable

ESG-funded Emergency Shelter projects are expected to participate in CE in the following ways:

- Provide the Access, Diversion, and Assessment phases of CES; and
- To the extent the project is funded to do so: provide the Prevention and Rapid Exit phases of CES; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES

ESG-funded Homelessness Prevention projects expected to participate in CE to the fullest extent possible, which may include:

- Provide the Access, Diversion, and Assessment phases of CES; and
- To the extent the project is funded to do so: provide the Prevention and Rapid Exit phases of CES; and
- Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES

CE Policy and Procedures can be found at: <https://pennsylvaniacoc.org/resources/western-pa-coc-coordinated-entry-20>.

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<sup>3</sup> As of 2024, HUD is moving to a biennial (every 2 year) CoC NOFO. The CoC anticipates that renewal CoC grantees will only be required to submit an application for project funding to the CoC every 2 years.

<sup>4</sup> <https://www.law.cornell.edu/cfr/text/24/578.95>

<sup>5</sup> <https://www.law.cornell.edu/cfr/text/24/576.404>

Non-CoC and non-ESG funded temporary and permanent housing projects are encouraged to fill vacancies through CES and participate in case conferencing.

**CoC PARTICIPATION** All CoC recipients are required to participate in CoC-wide meetings, RHAB meetings and required CoC trainings. CoC will notify grantees of trainings via CoC mailing list and will indicate which trainings are required vs. optional. CoC-funded programs should also participate in CoC subcommittees and/or ad hoc workgroups as appropriate. ESG-funded programs are encouraged to participate in any of the above as well and may be required to participate as directed by their funder. CoC Recipients are expected to communicate all CoC training and meeting opportunities with their subrecipients and encourage subrecipient participation.

**DIVERSION** All Access Point, Street Outreach, and Emergency Shelter projects will attempt to return the participant to safe housing using Diversion techniques as part of the housing problem-solving (HPS) approach to services. This can include strengths-based problem-solving conversations, identifying community supports, and offering lighter touch solutions. For participants who are unable to return to safe housing via Diversion, Coordinated Entry access point staff will attempt to return the participant to safe housing using Rapid Exit techniques as part of HPS.

Persons/Projects referring participants to ES or CE should be encouraged to explore alternatives to shelter prior to making a referral, whenever possible. This will require coordination with those operating other prevention Projects.

**EDUCATION FOR CHILDREN AND YOUTH EXPERIENCING HOMELESSNESS** All CoC projects will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood education programs such as Head Start, part C of the Individuals with Disabilities Education Act, and Education for Children and Youth Experiencing Homelessness programs authorized under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.). The educational needs of children should be taken into account when families are placed, and to the maximum extent practicable, families with children should be placed as close as possible to their school of origin so as not to disrupt the children's education.

**ENROLLMENT AND HMIS PROJECT START DATE** Project enrollment should be based on eligibility and CE prioritization, **not other factors such as residency**. See “Prioritization” in this section for information on prioritization.

Project start date in HMIS is based on project type<sup>6</sup>:

- Street Outreach: Date of first contact with the client.
- Emergency Shelter: Night the client first stayed in the shelter. Night by Night (NbN) shelters will have a ‘Project Start Date’ and will allow clients to re-enter as necessary without “exiting” and “restarting” for each stay for a specified period.
- Transitional Housing: Date the client moves into the residential project (i.e., first night in residence).
- Permanent Housing, including Rapid Re-Housing: Date the client was admitted into the project. To be admitted indicates the following factors have been met:
  1. Information provided by the client or from the referral indicates they meet the criteria for admission;

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<sup>6</sup> <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.pdf>

2. The client has indicated they want to be housed in this project; and
  3. The client is able to access services and housing through the project. The expectation is the project has a housing opening (on-site, site-based, or scattered-site subsidy) or expects to have one in a reasonably short amount of time.
- Other Service Projects (including but not limited to: Services Only, Day Shelter, Homelessness Prevention, Coordinated Entry): Date the client first began working with the project and generally received the first provision of service.

**ENVIRONMENTAL REVIEW** All CoC-funded projects (unless exempt) are required to complete an environmental review per 24 CFR 578.31<sup>7</sup>. However, per 24 CFR 576.407(d)<sup>8</sup>, ESG activities will require some level of environmental review & clearance. No funds may be expended until an environmental review that meets the standards outlined in 24 CFR 58<sup>9</sup> has been submitted and approved by PA Department of Community and Economic (DCED).

**FAITH-BASED ACTIVITY** Faith-based organizations are eligible, on the same basis as any other organization, to participate in HUD programs and activities, including CoC and ESG funding opportunities.

- A faith-based organization that applies for, or participates in, a HUD program or activity supported with Federal financial assistance retains its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct Federal financial assistance that it receives (e.g., via contract, grant, sub-grant, sub-award or cooperative agreement) to support or engage in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), or in any other manner prohibited by law.
- A faith-based organization that receives direct Federal financial assistance may use space (including a sanctuary, chapel, prayer hall, or other space) in its facilities (including a temple, synagogue, church, mosque, or other place of worship) to carry out activities under a HUD program without removing religious art, icons, scriptures, or other religious symbols.
- If an organization engages in explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), the explicitly religious activities must be offered separately, in time or location, from the programs or activities supported by direct Federal financial assistance and participation must be voluntary for the beneficiaries of the programs or activities that receive direct Federal financial assistance.
- Any organization that receives Federal financial assistance under a HUD program or activity shall not, in providing services or carrying out activities with such assistance, discriminate against a beneficiary or prospective beneficiary on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

[for additional details, see 24 CFR 5.109(e)(g)<sup>10</sup> for CoC-funded and 24 CFR 576.406<sup>11</sup> for ESG funded]

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<sup>7</sup> <https://www.law.cornell.edu/cfr/text/24/578.31>

<sup>8</sup> <https://www.law.cornell.edu/cfr/text/24/576.407>

<sup>9</sup> <https://www.hudexchange.info/resource/167/environmental-review-procedures-24-cfr-58/>

<sup>10</sup> <https://www.law.cornell.edu/cfr/text/24/5.109>

<sup>11</sup> <https://www.law.cornell.edu/cfr/text/24/576.406>



**FAIR HOUSING AND EQUAL ACCESS** Projects must make known that use of the facilities and services are available to all on a nondiscriminatory basis, in a manner that furthers fair housing in accordance with Fair Housing and Equal Opportunity laws and regulations. Each Project needs to address their state, local and municipality requirements regarding fair housing rules and regulation.

See Appendix B for CoC Inclusion and Non-Discrimination Policies.

Projects must also follow:

- **Equal Access in Accordance with Gender Identity Final Rule (2016)**<sup>12</sup>
- **Equal Access to Housing Final Rule (2012)**<sup>13</sup>
- **HUD Notice CPD-15-02: Appropriate Placement for Transgender Persons in Single-Sex ES and Other Facilities**, which provides guidance to Emergency Solutions Grants (ESG), Continuum of Care (CoC), and Housing Opportunities for Persons With AIDS (HOPWA) funded providers on how best to provide shelter to transgender persons in a single-sex facility and on appropriate and inappropriate inquiries related to a potential participant's sex for the purposes of placing transgender persons in temporary, ES, or other facilities with shared sleeping areas or bathrooms.
- **Violence Against Women Act (2022)** -- Applies for all victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking, regardless of sexual orientation, gender identity, sex, or marital status, and which must be applied consistent with all nondiscrimination and fair housing requirements.
- **Fair Housing and Equal Opportunity-** In accordance with 24 CFR 578.93<sup>14</sup>, projects must follow nondiscrimination and equal opportunity requirements as well as those requirements set forth in 24 CFR 5.105(a)<sup>15</sup>.
  - **Affirmative Outreach.** 24 CFR 578.93(c)<sup>16</sup> for CoC-funded and 24 CFR 576.407(b)<sup>17</sup> for ESG-funded requires that projects must affirmatively market housing and supportive services to eligible persons--regardless of race, color, national origin, religion, sex, age, familial status, or handicap--who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities. To ensure the CE process assists CoC Project and ESG Project recipients in meeting the Affirmatively Furthering Fair Housing requirement, Western PA CoC is committed to providing marketing resources, auxiliary aids and other services necessary to ensure effective communication with persons accessing the homeless response system, which includes ensuring that information is provided in appropriate accessible formats as needed, such as Braille, audio, large type, assistive listening devices, and sign language interpreters, as well as accommodation for persons with limited English proficiency. Resources will be developed and made available by the CoC designated Lead Agency and marketing plans described within the CE Policy and Procedure Manual. Housing assisted by HUD and made available through the CoC must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2).

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<sup>12</sup> <https://www.federalregister.gov/documents/2016/09/21/2016-22589/equal-access-in-accordance-with-an-individuals-gender-identity-in-community-planning-and-development>

<sup>13</sup> <https://www.federalregister.gov/documents/2012/02/03/2012-2343/equal-access-to-housing-in-hud-programs-regardless-of-sexual-orientation-or-gender-identity>

<sup>14</sup> <https://www.law.cornell.edu/cfr/text/24/578.93>

<sup>15</sup> <https://www.law.cornell.edu/cfr/text/24/5.105>

<sup>16</sup> <https://www.law.cornell.edu/cfr/text/24/578.93>

<sup>17</sup> <https://www.law.cornell.edu/cfr/text/24/576.407>

- A recipient must implement its Projects in a manner that affirmatively furthers fair housing, which means that the recipient must:
  - Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;
  - Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective Project participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and
  - Provide Project participants with information on rights and remedies available under applicable federal, State, and local fair housing and civil rights laws.
- **Accessibility and integrative housing and services for persons with disabilities.** Recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR 100<sup>18</sup>), Section 504 of the Rehabilitation Act of 1973 (24 CFR 8<sup>19</sup>), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR 35<sup>20</sup> and 36<sup>21</sup>). In accordance with the requirements of 24 CFR 8.4(d)<sup>22</sup>, recipients must ensure that their Project’s housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.
- **Reasonable Accommodations and Modifications for Persons with Disabilities**<sup>23</sup>. Persons with disabilities may be entitled to reasonable accommodation and/or modifications. A request for reasonable accommodation must be made by or on behalf of a person with a disability. The request must be necessary i.e., there must be a disability-related need for the reasonable accommodation or modification. In addition, the request must be reasonable. i.e., cannot impose an undue financial and administrative burden on the housing provider or fundamentally alter the nature of the provider's operations. The Act makes it unlawful to refuse to make reasonable accommodations to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling. The Act also makes it unlawful for a housing provider or homeowners’ association to refuse to allow a reasonable modification to the premises when such a modification may be necessary to afford persons with disabilities full enjoyment of the premises. Required Documentation is as follows:
  - A provider is entitled to obtain information that is necessary to evaluate if a requested reasonable accommodation may be necessary because of a disability. If a person's disability is obvious, or otherwise known to the provider, and if the need for the requested accommodation is also readily apparent or known, then the provider may not request any additional information about the requester's disability or the disability-related need for the accommodation.

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<sup>18</sup> <https://www.law.cornell.edu/cfr/text/24/part-100>

<sup>19</sup> <https://www.law.cornell.edu/cfr/text/24/part-8>

<sup>20</sup> <https://www.law.cornell.edu/cfr/text/28/part-35>

<sup>21</sup> <https://www.law.cornell.edu/cfr/text/28/part-36>

<sup>22</sup> <https://www.law.cornell.edu/cfr/text/24/8.4>

<sup>23</sup> For more information refer to the Housing Equality Center of Pennsylvania’s *Guide to Reasonable Accommodations and Modifications* <https://www.equalhousing.org/resources/fair-housing-guide-to-reasonable-accommodations-and-modifications-41-pages/>

- If the requester's disability is known or readily apparent to the provider, but the need for the accommodation is not readily apparent or known, the provider may request only information that is necessary to evaluate the disability-related need for the accommodation.
- If the requesters disability is not obvious or the need for the request is not obvious, a housing provider may request reliable disability-related information that (1) is necessary to verify that the person meets the Act's definition of disability (*i.e.*, has a physical or mental impairment that substantially limits one or more major life activities), (2) describes the needed accommodation, and (3) shows the relationship between the person's disability and the need for the requested accommodation.
- **Guidance for Creation of Nondiscrimination and Fair Housing Policies.** All provider agencies, including assessment centers are required to uphold and provide to the Western CoC-designated CE Lead Agency with the following:
  - Verification that they have policies which ensure the agency does not tolerate discrimination and comply with all nondiscrimination, fair housing, and equal opportunity laws.
  - Verification of availability of aids and services, upon request, to ensure effective communication, such as the availability of qualified sign language interpreters, documents in Braille, or other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.
  - Verification that a Project has a reasonable accommodation policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
  - If the agency acts as a landlord, verification that the agency has a reasonable modification policy that would allow a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit will be provided.
  - Verification that the agency has a complaint procedure to provide to the Project participant to report discrimination.

**HMIS PARTICIPATION** All Projects, apart from projects operated by Victim Service Providers (VSPs), must enter data into PA HMIS accurately and in a timely manner (defined as within 7 days). Projects operated by VSPs must enter data into a comparable database accurately and in a timely manner and make their aggregate data available to the CoC for planning, monitoring and ranking. Projects should use this data to measure project outcomes and identify areas for improvement. Non-CoC and non-ESG-funded projects are also encouraged to track project data using HMIS or a DV comparable database. Projects should reference the most updated HMIS Policies and Procedures for additional guidance (HMIS users can find this in the ClientTrack “PA HMIS Reading Materials folder”).

**HOUSEHOLDS WITH CHILDREN** For projects that serve households with children:

- Projects must take the educational needs of children into account when families are placed in housing and to the maximum extent practicable, and place families with children as close as possible to their school of origin so as not to disrupt such children’s education.
- A staff person must be designated as the educational liaison that will ensure that children are enrolled in school, connected to appropriate services in the community, including early childhood Projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services.
- Projects are prohibited from denying assistance to or separating members of a family with children based on gender or age.

- 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 a project that receives funds under this part.

See HUD FAQ # 1529<sup>24</sup>, which is relevant to this requirement.

**HOUSING FIRST AND LOW-BARRIER ACCESS** Housing First is a proven approach in which all people experiencing homelessness are believed to be housing ready and are provided with permanent housing immediately with few to no preconditions, behavioral contingencies, or barriers. Effectively implementing a Housing First approach involves prioritizing people with the highest needs and vulnerabilities, engaging more landlords and property owners, and making our projects person-centered spaces without barriers to entering and remaining in the project. People experiencing homelessness have the right to self-determination and should be treated with dignity and respect. Projects must follow the principles of Housing First and Low-Barrier access, which include:

- Admission/participant screening and selection practices are based on HUD eligibility, promote the acceptance of applicants/not screening participants out, and are not based on preconditions.
- Projects must allow entry to applicants regardless of their income, current or past substance use, completion of treatment, history of victimization (e.g., domestic violence, sexual assault, childhood abuse), criminal record—except restrictions imposed by federal, state, or local law or ordinance (e.g., restrictions on serving people who are listed on sex offender registries), poor credit or financial history, poor or lack of rental history, eviction history, or willingness to participate in supportive services.
- Supportive services are voluntary, housing-focused, and emphasize engagement and problem-solving over therapeutic goals. Service plans are housing-focused and highly participant-driven without predetermined goals, meaning plans are determined by the needs, wishes, and preferences of the participant. Projects must not require participation in supportive services or progress on goals for continued tenancy, occupancy, or participation in the project.
- Participation in services or project compliance is not a condition of PSH. RRH Projects may require monthly case management as a condition of receiving rental assistance. Housing First is not “housing only.” While it is acceptable for projects to require all participants to meet with a case manager, a participant must not be evicted from, or terminated from, the project for failure to meet with the case manager.
  - Per HUD, “If following a Housing First approach, it is acceptable to require all program participants to meet with a case manager, but it is not acceptable to require participation in supportive services. It is important to note that the purpose of any case management should be to engage the program participant. Additionally, a program participant must not be evicted from, or terminated from, the program for failure to meet with the case manager.”<sup>25</sup>”
- Leases or occupancy agreements cannot have stipulations that would not be found outside of a standard rental agreement.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered reason for eviction by the Agency. Receiving approval from the CoC, agencies may adopt a “no use or consumption” on property rule.
- The project prioritizes those with the highest need for services (in accordance with CE policies and procedures), rather than "first come/first served".

<sup>24</sup> <https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>

<sup>25</sup> <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/service-requirements/case-management/>

- Case managers/service coordinators are trained in and actively employ evidence-based practices for participant engagement such as motivational interviewing and person-centered counseling.
- Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and/or addiction are a part of participants' lives, where participants are engaged in non-judgmental communication regarding drug and alcohol use, and where participants are offered education regarding how to avoid risky behaviors and engage in safer practices.

See **Appendix C** for CoC Access/Barriers Policy, which outlines expectations regarding Housing First.

For more information on suggested Housing First implementation ideas please refer to **USICH's Housing First Checklist**<sup>26</sup>.

**INCORPORATING THE EXPERTISE OF PERSONS WITH LIVED EXPERIENCE (PWLE):** Each recipient and subrecipient of CoC/ESG funding must, to the maximum extent possible, involve persons with lived experience/expertise of homelessness into project design/delivery, as well as involvement through employment; volunteer services; or otherwise in operating or providing supportive services for the project.

- CoC-funded projects:
  - Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided<sup>27</sup>.
    - This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with persons with lived experience/ expertise of homelessness when considering and making policies and decisions.
  - At the project level, provider organizations are expected to create their own plans and strategies for incorporating the expertise and perspectives of PWLE into project design and delivery. CoC recipients or subrecipients should take substantive actions to incorporate the input and expertise of persons with lived experience of homelessness into program design, implementation, and improvement. Substantive actions are those that are likely to result in an observable or measurable impact on agency operations or programming. This may include, but is not limited to:
    - Establishing program- or agency- level advisory boards specifically composed of PWLE (who may be current or past participants of the agency) and who also participate in the broader governance;
    - Surveying program participants regularly for their feedback on the programs they have participated in;
    - Recruiting, hiring and actively supporting PWLE to work at all levels within their organization, including providing appropriate training and opportunities for advancement.

As the CoC develops best practices and policies related to the greater incorporation of PWLE in the governance and oversight of the system, additional requirements of programs may be

<sup>26</sup> [https://www.usich.gov/sites/default/files/document/Housing\\_First\\_Checklist\\_FINAL.pdf](https://www.usich.gov/sites/default/files/document/Housing_First_Checklist_FINAL.pdf)

<sup>27</sup> [https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578#p-578.75\(g\)](https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578#p-578.75(g))

added.

- ESG-funded projects must follow 24 CFR 576.405<sup>28</sup>. The provisions requiring homeless participation on boards or in an advisory capacity can be fulfilled by ESG Grantees bringing any policy decisions regarding their facility and services to the CoC governing board where homeless participation is already existing. Also, to the maximum extent practicable, Grantees should involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG Project, and in providing services for occupants of facilities assisted with ESG.

**INSPECTIONS** Rental units assisted with CoC Rental Assistance payments must meet *Housing Quality Standards* per 24 CFR 982<sup>29</sup> and 24 CFR 578.75<sup>30</sup>. ES projects that receive assistance for shelter operations are required to meet *Minimum Habitability Standards*. If ESG funds are used to help a project participant remain in or move into permanent housing, that housing must also meet Minimum Habitability Standards. Shelters renovated with ESG funds are also required to meet state or local government safety and sanitation standards as applicable and use energy-efficient materials including Energy Star and WaterSense products and appliances. Refer to 24 CFR 576.403<sup>31</sup> for details on the housing standards. Moreover:

- Lead-based paint remediation and disclosure applies to all ESG-funded shelters and all housing occupied by ESG participants. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821- 4846<sup>32</sup>), and the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C 4851-4856<sup>33</sup>), subparts of the implementing regulations at 24 CFR 35, Subparts A, B, H, J, K, M and R<sup>34</sup> apply to activities under this grant Project. The Grantee must also comply with the Lead, Renovation, Repair, and Painting Project Final Rule, 40 CFR 745<sup>35</sup>, where applicable.

**LIMITED ENGLISH PROFICIENCY** All CoC- and ESG-funded projects should take reasonable steps to ensure meaningful access to their projects and activities by individuals with Limited English Proficiency, regardless of the language spoken. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Grantees must follow the requirements outlined in 24 CFR 576.407(b)<sup>36</sup>. HUD published Final Guidance to Federal Financial Assistance Requirements Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons in the Federal Register on January 22, 2007 (72 F.R. 2732)<sup>37</sup>.

**MAINSTREAM BENEFITS:** All projects must promote access to and effective utilization of

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<sup>28</sup> <https://www.law.cornell.edu/cfr/text/24/576.405>

<sup>29</sup> <https://www.law.cornell.edu/cfr/text/24/part-982>

<sup>30</sup> <https://www.law.cornell.edu/cfr/text/24/578.75>

<sup>31</sup> <https://www.law.cornell.edu/cfr/text/24/576.403>

<sup>32</sup> <https://www.law.cornell.edu/uscode/text/42/chapter-63>

<sup>33</sup> <https://www.law.cornell.edu/uscode/text/42/chapter-63A>

<sup>34</sup> <https://www.law.cornell.edu/cfr/text/24/part-35>

<sup>35</sup> <https://www.law.cornell.edu/cfr/text/40/part-745>

<sup>36</sup> <https://www.law.cornell.edu/cfr/text/24/576.407>

<sup>37</sup> <https://www.federalregister.gov/documents/2014/11/28/2014-27960/guidance-to-federal-financial-assistance-recipients-regarding-the-title-vi-prohibition-against>

mainstream benefits. Projects must have specific plans for ensuring participants will be individually assisted to obtain the benefits of mainstream health, social, and employment programs for which they are eligible to apply and that meet the needs of program participants (e.g., Medicare, Medicaid, SSI, Food Stamps/SNAP, local Workforce office, early childhood education, TANF, substance use disorder programs, employment assistance programs).

Projects should be providing regular or as needed transportation assistance to attend mainstream and community resource appointments, employment training, educational programs, and jobs. Transportation assistance may include bus passes, rail/subway cards, vehicle owned by the organization, etc.

Projects must follow up with participants at least annually to ensure they applied for mainstream benefits (e.g., TANF, food stamps, SSI) for which they are eligible, are receiving the benefits, and renew benefits as required.

Projects must ensure participants have access to SSI/SSDI technical assistance, provided by either the project, subrecipient, or partner agency. If program participants have access to SSI/SSDI technical assistance, the staff person providing the SSI/SSDI technical assistance should have completed SOAR training in the past 24 months.

**MATCHING FUNDS** CoC-funded projects must follow 24 CFR 578.73<sup>38</sup> Matching requirements. ESG-funded projects should refer to the application and regulations associated with their contract year.

**PERFORMANCE MEASURES** All projects are expected to strive to meet CoC Performance Goals as outlined in the CoC/ESG quarterly monitoring reports and/or the CoC renewal evaluation standards. Some performance goals are universal across all project types, while some are project type specific. Performance measures by project type are provided below under Standards by Project Type.

**POINT IN TIME COUNT PARTICIPATION** All CoC and ESG-funded Projects must participate in the annual point-in-time count, including participation in the unsheltered count if needed. This includes:

- Participation in the Sheltered PIT Count entails ensuring all HMIS data is complete and up to date.
- A) Victim Service Providers, B) non-CoC/ESG funded projects not participating in HMIS, and C) HMIS-participating projects for which data is not current/updated will be asked to complete and submit Sheltered PIT forms.
- Participation in the Housing Inventory Count entails completing and submitting the CoC's Housing Inventory Count survey.
- Participation in the Unsheltered PIT Count entails a) serving as the county unsheltered PIT Count coordinator leading efforts to plan and execute the unsheltered count if no other county coordinator has been identified, including submitting the county's data to the CoC; and/or b) participating as a volunteer on the night of the unsheltered count.

**PRIORITIZATION** Prioritization standards for Emergency Service Projects (HP, SO, ES and TH) and Housing Projects (RRH and PSH) are aligned with the CoC's Strategic Plan and HUD policy guidance.

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<sup>38</sup> <https://www.law.cornell.edu/cfr/text/24/578.73>

The Western PA CoC CE System (CES) provides the platform for projects to adhere to the prioritization standards that follow. The CES is required to provide a tool for evaluating households' chronicity, medical vulnerability, acuity, and ability to address their own housing instability. To learn more about how CE integrates with these standards, please Coordinated Entry policy documents at: <https://pennsylvaniacoc.org/resources/western-pa-coc-coordinated-entry-20>.

The CoC has adopted HUD Notice CPD-16-11 on Prioritizing Persons Experiencing Chronic Homelessness and other Vulnerable Homeless Persons. While designed to provide guidance on PSH enrollments specifically, the CoC believes these prioritization strategies provide guidance that also aligns with their local priority and are therefore applicable across the CoC's housing interventions. The overarching goal of this Notice is to ensure that those individuals and families who have spent the longest time in places not meant for human habitation, in ES, or in safe havens, and who have the most severe service needs within a community are prioritized.

Housing Projects should utilize the CES tools and processes, specifically regional case conferencing, to identify the highest priority households that meet their eligibility criteria. Every household must first meet the project eligibility criteria. It is the responsibility of the enrolling project to ensure that referred households are eligible and to either update the household record or inform CES staff when households are identified as ineligible.

CES assessment tools identified to prioritize households for assistance include: the quantitative CE assessment tool<sup>39</sup> and the qualitative Housing and Service Needs (HN/SN) Assessment. The scores generated by these assessments will be used to inform a household's placement on the regional prioritized by-name list (BNL), along with the following criteria and data points:

- Chronic homeless status
- Length of time (LOT) homeless
- Severity of service needs and housing needs as measured by the assessment tools

Each region's CES housing prioritization list will be prioritized in the following way:

<b>Priority Bracket</b>	<b>Criteria</b>	<b>Tie-Breaker</b>
First Priority	Special populations designated in accordance with the CES P&P	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
Second Priority	People experiencing chronic homelessness	HN/SN Score, LOT Homeless, then CE Assessment Tool Score
Third Priority	All eligible households not included under First Priority or Second Priority	HN/SN Score, LOT Homeless, then CE Assessment Tool Score

Each CE Region will meet periodically for case conferencing to determine which participants on that Region's housing prioritization list will be referred to available project slots.

<sup>39</sup> As of fall 2024 the CoC is using the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the quantitative CE assessment tool. However, this is subject to change.



**PROJECT EVALUATION** CoC projects are evaluated annually through the local CoC renewal funding competition process as described in the [CoC's Funding Process and Policies](#) (2024 version linked here; most updated version available on CoC website), which are updated annually and posted on the CoC website. Underperforming projects may be required to develop a quality improvement plan, receive technical assistance from the CoC, and/or have their funding reallocated in order to fund new projects, depending on the circumstances. CoC projects should refer to the CoC Funding Process and Policies.

ESG projects are evaluated through the CoC/ESG quarterly monitoring reports. DCED reviews all ESG grantee invoices to ensure eligible expenses are incurred and monitors all of its ESG subrecipients.

**TERMINATION** Projects should have a formal procedure for terminating a participant's assistance that recognizes the rights of the participant(s) involved:

- Eviction by a landlord in a scattered site project should not result in termination from the ESG/CoC project.
- Projects must use judgement and examine all extenuating circumstances in determining whether a violation should result in termination. Projects should make multiple, documented attempts to bring the household into compliance with their lease or occupancy agreement. Assistance should only be terminated in the most severe cases, when no other viable alternative is available, and when interventions supporting the household to remain in the project have been unsuccessful.
- Every effort should be made to allow the participant to remain in the project.
- Projects should follow a Housing First approach which outlines the following tenets related to terminations:
  - Housing is not dependent on participation in services, or demonstration of progress made on a service plan. Services must be offered by staff but are voluntary for participants. While it is acceptable for projects to require all participants to meet with a case manager, a participant must not be evicted from, or terminated from, the project for failure to meet with the case manager. Substance use in and of itself (without other lease violations) is not a reason for termination. Note: If a project is a recovery housing model, focused on people who are in early recovery from drugs or alcohol (as outlined in HUD's Recovery Housing Brief: <https://www.hudexchange.info/resource/4852/recovery-housing-policy-brief/>), different standards related to use and subsequent offer of treatment may apply.
- Termination does not preclude assistance at a future date.
- Termination should not result in a return to homelessness, instead households should be referred either back to the CoC's CES for enrollment into an appropriate project or to another non-CE-related resource pursuant to their level of need.

**Possible reasons for termination:**

- Termination will occur if the qualifying member of the household:
  - Is institutionalized or incarcerated for 90 days or more (PH Projects only);
  - Moves out of the service area;
  - Voluntarily exits the project; or
  - Passes away
- Termination may also occur if the participant has moved out of their unit and the project is unable to make contact with the participant. The project should make multiple attempts, using different methods (such as phone, in-person visits, and written notice) to make contact with participants.

- Participants who are repeatedly given notices from their landlord or provider organization for non-payment of their portion of the rent, damaging the unit, harassing other tenants, criminal activities, or continued lease violations despite warnings may be terminated from the project. In the spirit of the supportive aspects of homeless assistance projects, the agency will document reasonable efforts and interventions that demonstrate attempts to encourage participants' compliance with project rules and expectations. Project termination should be seen as a last resort.
- In some severe cases (e.g., violence, or serious threats of violence, toward Project staff, volunteers or other participants/tenants; unable to live safely alone/ unsupervised in their home)), termination from the project may be immediate.
- Projects with operating or leasing dollars that utilize occupancy agreements or subleases with participants must follow applicable landlord/ tenant laws when terminating a household's assistance.

**Further per 24 CFR 576.402<sup>40</sup> – Terminating Assistance (ESG) and 24 CFR 578.91<sup>41</sup> (CoC):**

- In general: If a project participant violates project requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgement and examine all extenuating circumstances in determining when violations warrant termination so that a project participant's assistance is terminated only in the most severe cases.
- Project participants receiving rental assistance or housing relocation and stabilization services: To terminate rental assistance or housing relocation and stabilization services to a project participant, the required formal process, at a minimum, must consist of:
  - Providing the project participant with a written copy of the project rules and the termination process before the participant begins to receive assistance;
  - Written notice to the project participant containing a clear statement of the reasons for termination;
  - A review of the decision, in which the project participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
  - Prompt written notice of the final decision to the Project participant.

See "General Standards for All Projects- Termination," for more details on participant terminations.

**TRANSFERS**

- **Emergency Transfers:**
  - Projects must follow the CoC's **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix D)**.
  - In accordance with the VAWA, Western PA CoC homeless assistance Projects providing housing or rental assistance must allow participants who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to request an emergency transfer from the participant's current unit to another unit. This requirement applies to Projects receiving Continuum of Care (CoC) or Emergency Solutions Grant (ESG) funding. The ability to request a transfer is available regardless of sexual orientation, gender identity, sex, or marital status.

<sup>40</sup> <https://www.law.cornell.edu/cfr/text/24/576.402>

<sup>41</sup> <https://www.law.cornell.edu/cfr/text/24/578.91>

- CoC/ESG providers will work with the Western PA CoC’s CES to enact an emergency transfer through resources beyond those available within the provider’s own organization. The ability of the Western PA CoC’s CES to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and on whether another dwelling unit is available and is safe to offer the participant for temporary or more permanent occupancy.
- A participant is eligible for an emergency transfer when any member of the household is a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements of the policy.
- For households receiving tenant-based rental assistance, the following procedures will be followed for non-transferring household member(s), if the household separates in order to affect an emergency transfer:
  - For households living in units that are otherwise assisted, the required policies must provide that for project participants who qualify for an emergency transfer, the household shall have priority over all other applicants for rental assistance, TH, and PSH projects funded through the CoC provided that the household meets all eligibility criteria required by Federal law or regulation or HUD NOFO; and the household meets any additional criteria or preferences established in accordance with Fair Housing 24 CFR 578.93(b)(1), (4), (6) or (7)<sup>42</sup>. The households shall not be required to meet any other eligibility criteria or preferences for the project. The household shall retain their original homeless or chronically homeless status for the purposes of the transfer.
  - Please see **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix D)** for information on: Emergency Transfer Request Documentation, Confidentiality, Emergency Transfer Timing and Availability, and Protocol for Transfer Request.
- **Transfers between projects within the same project model**
  - When a current household must transfer to another Project within the same Project model (e.g., PSH to PSH, RRH to RRH), the provider should prioritize the household for resources operated by/available through their own organization.
  - If the provider cannot transfer the household internally, they should email the Regional CE Specialist requesting the household be reviewed at the next Regional case conferencing meeting. The provider will be expected to present information about why the household needs a transfer, including information about the efforts made by the current provider to meet the household’s needs and how the household will benefit from being served by a different provider. Attendees of the Regional case conferencing will determine if the household will be prioritized. **Transfers from one project model to another (RRH to PSH)**

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<sup>42</sup> <https://www.law.cornell.edu/cfr/text/24/578.93>

- Project transfers may be made from RRH or TH to PSH so long as the household meets the eligibility criteria under the specific project and the requirements for the PSH project in the NOFO for the year the project was awarded.
- Please note: RRH providers are expected to gather all information necessary to determine if a household meets the chronic homeless definition (disability information and verification of homelessness, see **Templates for CoC and ESG related programs Supplemental Resource**) within 45 days of project enrollment. These documents should be uploaded to the global client documents within HMIS. Failure to do so will not allow for these households to receive the necessary additional priority for being chronically homeless for transfers.
- All transfers from one project model to another must begin with an email to the Regional CE Specialist requesting the household be reviewed at the next Regional case conferencing meeting. The provider will be expected to present information about why the household needs a transfer, including information about the efforts made by the current provider to meet the household's needs and how the household will benefit from being served by a different provider.
- Attendees of the Regional case conferencing will determine if the household will be prioritized. While TH to PSH transfers are eligible under the order of priority, TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. Therefore, TH residents will not be prioritized for PSH transfers unless there are no other eligible chronically homeless households for the PSH project opening.

### **VIOLENCE AGAINST WOMEN ACT (VAWA)**

- Background: The Violence Against Women Act (VAWA), reauthorized in 2022<sup>43</sup>, includes certain housing protections for victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking, who are applying for or residing in HUD funded housing programs, including ESG and CoC programs. VAWA provides housing protections to survivors, regardless of the victim's sexual orientation, gender identity, sex, or marital status.
- Changes to the McKinney-Vento Homeless Assistance Act Definition of Homelessness: For ESG and CoC Programs, VAWA 2022 amended Section 103(b) of the McKinney-Vento Homeless Assistance Act to require HUD to consider homeless any individual or family who:
  - (1) is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
  - (2) has no other safe residence; and
  - (3) lacks the resources to obtain other safe permanent housing.
- **HUD VAWA Forms**<sup>44</sup>: Western PA CoC housing providers must provide all households applying for/ participating in ESG or CoC funded housing the following HUD VAWA Forms (which are available on the HUD website<sup>45</sup> and linked below) at a minimum:
  - (1) When a household is denied housing assistance from a program;
  - (2) When a household is enrolled in/begins receiving housing assistance from a program;
  - (3) When a household receives a notification of eviction; and

<sup>43</sup> [https://www.hud.gov/program\\_offices/housing/mfh/violence\\_against\\_women\\_act](https://www.hud.gov/program_offices/housing/mfh/violence_against_women_act)

<sup>44</sup> [https://www.hud.gov/program\\_offices/housing/mfh/violence\\_against\\_women\\_act](https://www.hud.gov/program_offices/housing/mfh/violence_against_women_act)

<sup>45</sup> [https://www.hud.gov/program\\_offices/housing/mfh/violence\\_against\\_women\\_act](https://www.hud.gov/program_offices/housing/mfh/violence_against_women_act)

- (4) When a household is notified their housing assistance is ending / being terminated.
  - [Form HUD-5380 Notice of Occupancy Rights under VAWA](#)<sup>46</sup>: informs households of their VAWA housing protections.
  - Form 5382 [Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation](#)<sup>47</sup>: is 1 of 4 HUD-approved ways of documenting a person’s status as a victim of a crime that VAWA protects. Housing providers must accept Form HUD-5382 / self-certification as sufficient documentation, and may not ask for nor require additional documentation to prove a participant’s victim status.
  - [Form HUD-5383, Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking](#)<sup>48</sup>: may be used by participants to request an emergency transfer and certify that they meet the conditions for an emergency transfer under the Violence Against Women Act (“VAWA”).
- The Western PA CoC Cover Sheets for HUD-5380, HUD-5382, and HUD-5383 found in Appendix E are a resource for providers to summarize these forms for participants in plain language.

**Lease Bifurcation and Removal:**

A housing provider may bifurcate a lease in order to remove the abuser or perpetrator from the lease in order to evict or terminate assistance to the household member who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, human trafficking, or stalking against another member of the household. The housing provider may not take away the rights of other eligible tenants to the unit or otherwise punish the remaining tenant(s)/ victim(s) of the abuse/ violence. The Housing Provider must follow Federal, State, and local eviction procedures in order to remove the abuser or perpetrator from the household. In order to divide a lease, the Housing Provider may, but is not required to, ask the victim for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, human trafficking, or stalking.

If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, the housing provider must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

If a housing provider bifurcates a lease to remove a household member who would otherwise be eligible under the household's current program, the housing provider is required to provide a 90-calendar-day period, as long as the period does not extend beyond the duration of the lease, for the household member who is being removed to do one or more of the following:

- To establish their eligibility under the same program; or
- To establish eligibility under another covered housing program, including, but not limited to, another CoC or ESG program, the housing choice voucher program; or
- to find alternative housing.

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<sup>46</sup> <https://www.hud.gov/sites/documents/5380.docx>

<sup>47</sup> <https://www.hud.gov/sites/documents/5382.docx>

<sup>48</sup> <https://www.hud.gov/sites/documents/5383.docx>

Housing providers may, at their discretion, extend that 90-day period by another 60 days. Regardless of its length, the period cannot extend beyond the duration of the lease. This requirement creates a window in which the household member who is being removed has priority access to the same program under which they have been served to date or to another housing program. This requirement is about promoting the work of CoC and ESG recipients to ensure that all people have access to safe, stable housing, part of which is working to ensure that people exit CoC and ESG programs to other permanent housing, regardless of the circumstances under which they're exiting.

When a victim and the rest of their household determine that moving to a new unit is their best way to achieve safe housing, the household member who is being removed/bifurcated out may remain in the original unit. The household member who is being removed/ bifurcated out is responsible for establishing their eligibility under either the existing program or another housing program to identify whether their original unit will continue to receive a subsidy, which is not guaranteed. The CoC's Housing First expectations apply to the lease bifurcation or removal process. Programs should not be terminating the removed household member except under the most serious circumstances, and programs should make efforts to rehouse the removed household member.

## **RECORD KEEPING STANDARDS FOR ALL PROJECTS**

All Projects should maintain records in keeping with the following basic standards. In addition, Project providers must maintain documentation as required by the specific Project regulations:

### **FINANCIAL RECORDKEEPING REQUIREMENTS**

- Documentation of all costs charged to the grant
- Documentation that funds were spent on allowable costs
- Documentation of the receipt and use of project income
- Documentation of compliance with expenditure limits and deadlines for expenditure
- Retain copies of all procurement contracts as applicable
- Documentation of amount, source and use of matching resources

Records must be retained for amount of time prescribed by applicable funding source

- ESG requirements provided in 24 CFR 576.500 - Recordkeeping and Reporting Requirements<sup>49</sup>.
- CoC requirements provided in 24 CFR 578.103 Recordkeeping Requirements<sup>50</sup>.

### **PARTICIPANT RECORDKEEPING REQUIREMENTS**

**CE PARTICIPATION** Documentation of project entrance through CE, including chronic homeless status, severity of service needs and housing needs as measured by the assessment tools, and length of time homeless.

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<sup>49</sup> <https://www.law.cornell.edu/cfr/text/24/576.500>

<sup>50</sup> <https://www.law.cornell.edu/cfr/text/24/578.103>

**GENERAL ELIGIBILITY** All Projects must evaluate and document individuals' and family's eligibility per the HEARTH Homeless Definition Final Rule<sup>51</sup>. The specific Categories of homeless eligibility and required documentation are provided with each Project type.

**GOAL PLANS/HOUSING STABILITY PLANS** A record of services and assistance provided to each participant, including initial and updated goal plans- See **sample Housing Plans (See Templates for CoC and ESG related programs Supplemental Resource)**. Projects should choose from among these examples, or create a template that includes all the elements included in the housing stability plan templates.

**INFORMED CONSENT/CONFIDENTIALITY** Relevant releases of information must be kept in each case file, including, but not limited to, the **PA HMIS Collaborative Client Consent (Appendix F)**. Projects must have written confidentiality/privacy standards with respect to their files, information sharing and personally identifying data maintained in HMIS. A notice should be made available to participants upon intake and upon request. Records containing personally identifying information must be kept secure and confidential.

**HOUSING/HOMELESS STATUS** Homeless or at-risk statuses must be documented for all programming. The priority for obtaining evidence, in order of preference, is as follows:

- Third-party documentation (**shelter agreement and/or Homeless Certification- See Templates for CoC and ESG related programs Supplemental Resource**)
- Intake worker observations (written verification of observations required, along with additional information, such as photographs, as feasible).
- Certification from the person seeking assistance (**Self-Certification of Homelessness- See Templates for CoC and ESG related programs Supplemental Resource**) (if this option is utilized, there must also be a written record of intake worker's due diligence to obtain above evidence).

However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to ES, receiving SO services, or being immediately admitted to shelter or receiving services provided by a victim service provider, as defined in section 401(32) of the McKinney-Vento Homeless Assistance Act, as amended by the HEARTH Act. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates entries are made.

For individuals exiting an institution where they stayed less than 90 days and were experiencing homelessness prior to entering the institution one of the forms of evidence above to document prior homelessness AND:

- Discharge paperwork or written/oral referral; or
- Written record of intake worker's due diligence to obtain above evidence AND certification by the individual that they exited the institution.

**INCOME DOCUMENTATION (THIS APPLIES TO HP, ES, TH, TH-RRH, RRH AND PSH PROJECTS)** Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609<sup>52</sup>. Annual income is defined as all amounts, monetary or not, which:

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<sup>51</sup> <https://www.govinfo.gov/content/pkg/FR-2011-12-05/pdf/2011-30942.pdf>

<sup>52</sup> <https://www.law.cornell.edu/cfr/text/24/5.609>

- 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 this section.
- Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Annual Income should be calculated considering:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation of a business (i.e., total revenue minus business operating expenses). This also includes any withdrawals of cash from the business or profession for your personal use.
- Monthly interest and dividend income credited to an applicant's bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
- Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.
- Income of Full-Time Students: The employment income of full-time students 18 years or older (excluding the head of household and spouse) in excess of \$480 is not counted in the annual income calculation.

Income will be verified through bank statements, award letters and/or recent paystubs when possible. When this is not possible, a letter from the employer, stating wages, will also suffice.

In the event that there is no way to verify income at time of enrollment or reassessment, or in cases when there is no income to document, a **Self-Declaration of Income Form (See Templates for CoC and ESG related programs Supplemental Resource)** will be completed. The latter is a last resort for individuals with an income and will indicate why alternate proofs of income were not available.

Once determined, the following indicate how income should be documented within HMIS:

- When a participant has income, but does not know the exact amount, a "Yes" response should be recorded for both the overall income question and the specific source, and the income amount should be estimated.
- Income received by or on behalf of a minor child should be recorded as part of household income under the Head of Household, unless the federal funder in the HMIS Project Specific Manual instructs otherwise. Income should be recorded at the client-level for heads of household and adult household members.
- Income data should be recorded only for sources of income that are current as of the information date (i.e., have not been specifically terminated). For example, if a participant's employment has been terminated and the participant has not yet secured additional employment, the response for Earned income would be "No."



If there is a change to expected project/participant contributions, reasons for such a change should be explained in case notes, and other documentation might be required to justify the change (proof of payment for unexpected expenditure, loss of job, etc.).

**TERMINATION** As mentioned in the “GENERAL STANDARDS FOR ALL PROJECTS-TERMINATION” section, the termination process with a participant must be well documented. To terminate rental assistance or housing relocation and stabilization services to a Project participant, the required formal process, at a minimum, must consist of:

- Providing the project participant with a written copy of the project rules and the termination process before the participant begins to receive assistance;
- Written notice to the project participant containing a clear statement of the reasons for termination;
- A review of the decision, in which the project participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the project participant.

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## CASE MANAGEMENT STANDARDS FOR ALL PROJECTS

**OVERALL JOB DESCRIPTION AND DUTIES** Every Case Manager should have a written job description detailing their major responsibilities and required/preferred qualifications. Case Managers should demonstrate an ability to work with diverse populations, presenting with a wide variety of needs. **Typical case management responsibilities, at a minimum, facilitate the following:**

- Development of a **Housing Plan (See Templates for CoC and ESG related programs Supplemental Resource)** with households. Plans are highly participant-driven without predetermined goals, and should build on each participant’s needs, goals, and strengths. The Housing Stability Plan should be reviewed monthly and revised, at a minimum, every 3 months. More frequent revisions will be needed during times of acute crisis.
- Creative problem solving to help households to self-resolve their housing crisis.
- Linkage to community-based services per the Housing Stability Plan.
- Promote access to and effective utilization of mainstream benefits:
  - Transportation assistance
  - Assistance with enrollment in income and non-income benefits
  - Follow-up at least annually to ensure benefits are received and renewed
  - Ensure access to SSI/SSDI technical assistance
- Engage participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement into permanent housing or maintenance of permanent housing. Projects should involve households in decisions about what they need to end their homelessness. This programming and planning should be respectful, incorporate strengths-based approaches and consumer choice.
- Help households address issues that may impede access to housing (such as credit history, arrears, and legal issues).
- Assist households with finding, moving into and maintaining housing. This may include engaging landlords and working closely with landlords to facilitate participant move-in and ongoing success in housing.

- Inform households of their eligibility for educational services and ensure children enrolled in the project are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act (IDEA), and Education for Children and Youth Experiencing Homelessness programs authorized under Subtitle VII of the McKinney Vento Homeless Assistance Act.
- Make appropriate and time-limited services and supports available to families and individuals to allow them to move quickly to permanent housing and/or retain permanent housing.
- Collect required documentation, per funder requirements.
- Provide or assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals. This includes providing or ensuring that the household has access to resources including childcare, education, employment and job training, financial literacy, health, legal services, public benefits access, substance use recovery, and transportation, among others (if needed and appropriate) so that they can sustain permanent housing upon exit. This includes providing advocacy on behalf of households as needed to access necessary services.
- For scattered site projects: assist with housing location, lease negotiation, determining rent reasonableness, and inspection.
- For SSO, ES, and TH projects: Help households identify and select among various permanent housing options based on their unique needs, preferences, and financial resources.

### **PRINCIPLES OF CASE MANAGEMENT**

- Person-Centered
  - Case Managers practice a person-centered approach that “ensures that the person who has experienced homelessness has a major say in identifying goals and service needs, and that there is shared accountability. The goal of case management is to empower people, draw on their strengths and capabilities, and promote an improved quality of life by facilitating timely access to the necessary supports, thus reducing the risk of homelessness and/or enhancing housing stability.”<sup>53</sup> Services should be participant-directed, highly individualized and tailored to participant’s needs, respectful of individuals’ rights to self-determination, and voluntary. Case Managers should be trained in person-centered case management strategies including Trauma-Informed Care, Motivational Interviewing, Critical Time Intervention and Harm Reduction, among others.
- Housing-Focused
  - Projects should focus on the goal of assisting participants to secure and maintain permanent, stable, affordable housing. For participants not currently in safe, decent, affordable housing, the primary goal is to develop a strategy to assist them in securing housing. For those already housed, the goal is to assure that adequate supportive services are in place so the participant/household can maintain housing.
- Trauma-informed care
  - Trauma-informed care is an organizational structure and framework that involves understanding, recognizing, and responding to the effects of all types of trauma. It emphasizes physical, psychological and emotional safety for both participants and providers, and helps participants rebuild a sense of control and empowerment. Trauma-informed care operates with the following principles:
    - **Consumer empowerment:** Using individuals’ strengths to empower them in the development of their goals;

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<sup>53</sup> <https://homelesshub.ca/blog/2015/case-management/>

- **Choice:** Informing consumers regarding Project and housing options so they can choose the options they prefer;
  - **Collaboration:** Maximizing collaboration among staff, participants and their families in organizational and individual goal planning;
  - **Safety:** Developing healthy home settings and activities that ensure consumers’ physical and emotional safety; and
  - **Trustworthiness:** Creating clear expectations with consumers about what proposed Projects entail, who will provide services, and how supports will be provided.
- Progressive engagement
  - Progressive Engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without assistance.
  - Progressive engagement recognizes that there is no way to accurately predict how much help someone may need to end their homelessness and avoid a return to the streets or shelter. While we know that many people can successfully exit homelessness and avoid immediately returning with a small amount of assistance, we also know that there are no dependable predictors to guide the amount of assistance needed. In this approach, participants are initially offered “light-touch” assistance, including help creating a reasonable housing placement/stabilization plan, housing information and search assistance, and limited financial assistance (first month’s rent, security deposit, short-term rental assistance). Progressive engagement may involve more frequent contacts during a participants’ early time in the project. All participant check ins should include a discussion of the housing stability plan to review progress, barriers and supports needed.
  - Projects using Progressive Engagement regularly reassess housing barriers and seek to close cases as soon as housing retention barriers are resolved. Projects should strive to provide the minimum level assistance necessary (i.e., lightest possible touch or just enough) for the shortest time possible to achieve housing stability.
- Housing First (as related to case management)
  - Supportive services emphasize housing procurement over therapeutic goals. Participation in services or project compliance is not a condition of staying in the project.
  - Case managers/service coordinators are trained in and actively employ evidence-based practices for participant engagement such as motivational interviewing and person-centered counseling.
  - Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of participants' lives, where participants are engaged in non-judgmental communication regarding drug and alcohol use, and where participants are offered education regarding how to avoid risky behaviors and engage in safer practices.
  - Refer to “General Standards for All Projects- Housing First and Low-Barrier Access” and “General Standards for All Projects-Termination” already mentioned for more detail.

**FREQUENCY** The frequency of case management services depends on the unique needs and situation of every project participant. Case Managers should be in direct contact with their participants at least

once a month.<sup>54</sup> The frequency of direct contact may increase due to the household's homeless status, acute needs, and overall lack of housing stability. In-person meetings with participants are preferred. Additional details about case management frequency can be found in the subsequent Project sections. The level of Case Management support is to match the needs of the household, addressing factors that can negatively impact housing stability. As such, the intensity of Case Management frequency, duration, and support can and will change over time.

Case management is always offered to anyone enrolled in programming and is strengths-based, trauma-informed, progressive, culturally competent, and person-centered. It is the participants' right to choose their level of involvement, and case management is an integral part of establishing stabilization when permitted to be incorporated. Those receiving Rental Assistance and/or Financial Assistance will always be offered case management.

**LOCATION/TIMING** Case management should occur at whatever location works best for the participants. While home-based visits are ideal for persons residing in scattered-site housing, case management can also occur in the office or in the community. Case management hours can also be flexed to be able to meet a participant before or after "typical" working hours.

**DURATION** As described in "General Standards for All Projects- Termination" section, Projects must use judgement and examine all extenuating circumstances in determining that a violation should result in termination, so that assistance is terminated in only the most severe cases. Every effort should be made to allow the participant to remain in the project until housing stability or alternate housing resources are obtained.

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## **STANDARDS BY PROJECT TYPE**

### **PERMANENT SUPPORTIVE HOUSING (PSH)**

PSH is community-based housing without a designated length of stay, offering a higher-level project option for those in need of such interventions. It is important to note that as needs change, a lower-level intervention may be more appropriate, at which time other options may be explored and decided upon between the project and participant. PSH provides housing assistance and supportive services to assist project participants to maintain their housing stability.

#### **Access**

Referrals to PSH must come through CE.

#### **Eligibility**

The following categories of individuals or families are eligible for PSH services:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence

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<sup>54</sup> Regular case management meetings may not be possible where prohibited by Violence Against Women Act ("VAWA") and the Family Violence Prevention and Services Act ("FVPSA").

AND

- At least one member of the household must have a disability

Regarding Project Transfers into PSH: In accordance with CE policy/procedure for transitioning households from RRH to PSH, households in RRH who are both eligible for PSH and in need of non-time limited supportive housing will be eligible to transfer from RRH to PSH. See “Transfers” section.

### **Prioritization**

Households must be prioritized through CE in accordance with HUD’s most current Notice on *Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in PSH*<sup>55</sup> (CPD-16-11 is the operational Notice at the time of the development of this Plan) and with the CoC’s Order of Prioritization.

All CoC and ESG funded projects are required to prioritize households with the longest history of homelessness and with the most severe service needs for all available CoC resources through regional CE case conferencing. The determination of severe service needs will be based on the Housing and Service Needs Assessment Score, CE Assessment Tool score<sup>56</sup>, and information presented during regional case conferencing.

100% of CoC-funded PSH units are chronic dedicated. This means that they should first be made available to a household that meets the chronically homeless definition. If there are no chronically homeless households choosing to occupy a particular PSH unit, it may then be rented to a non-chronically homeless household per the Order of Prioritization below.

#### Order of Prioritization for PSH Providers:

Each region’s CES prioritized by-name list will be prioritized in the following way:

<b>Priority Bracket</b>	<b>Criteria</b>	<b>Tie-Breaker</b>
First Priority	Special populations designated by the CoC	HN/SN Score, LOT Homeless, then CE Assessment Tool score
Second Priority	People experiencing chronic homelessness	HN/SN Score, LOT Homeless, then CE Assessment Tool score
Third Priority	All eligible households not included under First Priority or Second Priority	HN/SN Score, LOT Homeless, then CE Assessment Tool score

For households transferring into PSH from other housing projects, if the household was chronically homeless at entry into their current project, the household will be prioritized in the Second Priority Bracket. Within each priority bracket, it will be determined via case conferencing where a

<sup>55</sup> <https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>

<sup>56</sup> As of fall 2024 the CoC is using the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the quantitative CE assessment tool. However, this is subject to change.

transferring household will be prioritized compared to currently homeless households.

\*The CoC is committed to participant choice. **Therefore, in applying the order of priority,** households shall be considered for all counties they have expressed interest in via the CE assessment, *and* all counties in the region where they are currently experiencing homelessness.

^While TH to PSH transfers are eligible under the order of priority, TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. Therefore, TH residents will not be prioritized for PSH transfers unless there are no other eligible chronically homeless households for the PSH project opening. .

**Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:** If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix D).**

## Documentation

Relevant documentation standards include the information presented in the “Documentation for All Project Types” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Each potential Project participant must have **Documentation of Disability see Templates for CoC and ESG related programs Supplemental Resource.**
- Each potential Project participant must have **Documentation of Chronic Homelessness Status - See Templates for CoC and ESG related programs Supplemental Resource.** CoC-funded PSH projects must also follow the recordkeeping recommendations of HUD CPD Notice 16-11 regarding: Evidence of Severe Service Needs; Evidence that the Recipient is Following the CoC’s Written Standards for Prioritizing Assistance; and Evidence that there are no Households Meeting Higher Order of Priority within CoC’s Geographic Area.
- PSH projects should follow the detailed guidance on recordkeeping related to documenting chronic homelessness can be found in the HUD CoC Virtual Binder<sup>57</sup>.
- In most cases, PSH providers should obtain documentation of disability and chronic status prior to enrollment. However, please note that in some cases CoC-funded PSH projects may enroll a household without documentation if, based on the household’s intake screening, the project believes the household to be eligible but lacks the necessary paperwork at enrollment; AND the project can obtain the necessary documentation within 45 days of project enrollment. PSH providers should ensure that eligibility documentation is completed prior to move in. CoC-funded PSH projects should follow their regional CE Policies and Procedures related to documentation needed prior to enrollment.

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<sup>57</sup> <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/recordkeeping-requirements/>

- If self-certification of chronic homelessness is received, HUD recommends that the recipient continue to try to obtain third-party documentation within 180 days of the participant’s enrollment in the project. However, breaks in homelessness can be documented by self-certification.<sup>58</sup>
- An executed occupancy agreement or lease (**see sample lease in Templates for CoC and ESG related programs Supplemental Resource**) must include:
  - Renter's name and property address;
  - Landlord's name and address;
  - Lease or occupancy agreement start and end dates;
  - Monthly rent amount (including the prorated amount for the first month if a partial month);
  - Security deposit amount (if any);
  - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
  - Signatures of both parties.
  - HUD-91067 VAWA Lease Addendum<sup>59</sup>

### **Duration and Amounts**

Each Project participant should be assessed at least annually to determine whether they are able to move from PSH to other permanent housing without supports (either subsidized or market rate) in order to make PSH resources available for those with the greatest need for supported housing. If it is determined that it is feasible for a participant to exit from PSH, project staff should support them in this transition, including assistance with identifying alternative housing and connection to community supports. To support households transitioning from PSH, Project staff are encouraged to assist Project participants in signing up for all appropriate subsidized housing waiting lists, including: Housing Choice Vouchers, Public Housing, Senior Housing, and other privately-owned assisted housing.

To determine rent, if rental assistance is being applied (as opposed to leasing dollars), the rent contribution or the maximum occupancy charge is the highest of the following amounts (rounded to the nearest dollar):

- 30% of the family’s monthly adjusted income (as outlined at Part 5.609 and 5.611(a));
- 10% of the family’s monthly gross income; or
- If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family’s actual housing costs) is specifically designated by the agency to meet the family’s housing costs, the portion of the payments that is designated for housing costs.

Please keep in mind that for PSH projects in which rental assistance is provided, the rent contribution/occupancy charge is not optional and must equal the rent contribution specified above. For projects that provide PSH using funds other than rental assistance funds, the occupancy charge is optional and can be lower but not higher than the maximum occupancy charge specified above.

If an assisted unit is vacated before the expiration of the lease, the project may pay *no more* than 30 days from the end of the month in which the unit was vacated. Brief periods of stays in institutions (not to exceed 90 days) by project participants are not considered “vacancies”, and rent can continue to be paid on the unit while the project participant is in the institution.

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<sup>58</sup> <https://www.hudexchange.info/faqs/2872/for-many-persons-experiencing-chronic-homelessness-obtaining-the-required/>

<sup>59</sup> <https://www.hud.gov/sites/documents/91067.doc>

## Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards. Additional minimum standards for this project type include:

- Households must have a lease for at least one year which is automatically renewable for a term of at least one month and only terminable for cause.
- Scattered-site projects should engage in landlord engagement, including identifying available units, facilitating move-in, and ensuring participants’ ongoing success in housing.
- Projects must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a PSH participant’s assistance is terminated only in the most severe cases.

## Case Management

Relevant minimum standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Support services must be made available to Project participants, but they may not be required for continued Project eligibility.
- Case managers should offer monthly case management meetings, with more offered as needed (especially in the first year). Household case management needs may decrease over time. While participation in services is voluntary, case managers should offer services to all participants and work to engage participants, even if services have been declined in the past.
- For projects with operating or leasing dollars where occupancy agreements or sub-leases are used, the role of the case manager and the role of landlord/ property manager should be separate and distinct to ensure the case manager can engage with the participant to build trust and rapport instead of focusing on holding the participant accountable to their lease.
- For PSH projects with rental assistance dollars
  - Provide housing locator services. While the amount of assistance related to housing search varies by provider, at a minimum this should include:
    - Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
    - Provide education and outreach to landlords to address potential barriers to their participation
    - Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
    - Help individuals and families negotiate manageable and appropriate lease agreements with landlords
    - In general, some households may need more intensive assistance with housing search than others, due to barriers to tenancy (such as criminal record) or lack of experience with rental housing in the past. PSH providers with rental assistance dollars should be prepared to provide more assistance to households who may need a higher level of support to identify an eligible unit. This may include:
      - Assisting the household to look up eligible units online or via other local resources.
      - Assisting the household in calling landlords to inquire about available units.



- Accompanying the household to view units and meet with landlords.
    - Assisting the household in reviewing and understanding lease terms.
- If participants are found to no longer need supportive services, or to need limited services, the Project should work with the participant to explore Move On options. These discussions should be driven by participant choice.
  - **Move On Strategies:** HUD encourages communities to explore Moving On strategies for households in PSH who may no longer need or want the intensive services offered in PSH but continue to need assistance to maintain their housing. Moving On strategies challenge a community to create partnerships between the CoC/PSH housing Project and mainstream housing Projects, such as public housing, the Housing Choice Voucher (HCV) Project, and HUD-funded multifamily housing providers.
  - Some indicators that a participant may be ready to explore Move On options (not all indicators may be present; assessment of Move On should be person-driven and based on participant needs and wants):
    - Participant no longer needs the intensive services provided on PSH, and/or is connected (or can be connected) to community-based services that are not tied to participation in the PSH Project (e.g., housing choice vouchers, behavioral health case management, peer support, care management, etc.). The participant feels as though they have enough supports in place to maintain stabilization without PSH Project services;
    - Goals in previously created goal plans have been accomplished;
    - The household is paying rent in full (or to the level agreed upon as described above);
    - The participant’s primary service need is rental assistance/access to affordable housing;
    - The client would like to explore other housing opportunities.
  - For more information on Move On strategies, see HUD’s **SNAPS in Focus: Moving On Strategies to Support Stable Transitions from PSH**<sup>60</sup>.
- Shared Housing arrangements are allowable in PSH, and providers are encouraged to explore and support these arrangements if this would support the long-term housing stability of project participants<sup>61</sup>. Shared Housing arrangements may be particularly helpful in areas with high costs of living where renting an SRO or 1BR apartment may not be financially viable long term for individual participants.
  - Shared housing is broadly defined as a living situation where two or more individual or family units share a single housing unit. This includes sharing housing costs like rent and utilities. Each individual or family unit has their own personal space, but there are common spaces that are shared such as bathrooms, kitchen and living room. Housing units can be any unit with multiple bedrooms. It can be an apartment or an entire building. The homeowner can live on the premises or not, but if the homeowner is related to the tenants, CoC and ESG dollars cannot pay rent.
  - A one-bedroom unit cannot be used for shared housing. Shared housing is not the same as doubled up. Each individual or family unit has their own space and resides in housing that is permanent.
  - In a shared housing arrangement, each individual or family unit must hold their own lease.

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<sup>60</sup> <https://www.hudexchange.info/news/snaps-in-focus-moving-on-strategies-to-support-stable-transitions-from-permanent-supportive-housing/>

<sup>61</sup> <https://endhomelessness.org/blog/how-master-leasing-can-help-the-affordable-housing-crisis/>

- 4 keys to implementing a successful shared housing model<sup>62</sup>: 1) Identifying households who may be interested in shared housing; 2) Developing a process that matches appropriate people together, driven by client choice; 3) Engaging landlords who are amenable to split lease scenarios and streamlining the process as much as possible for landlords. Note that PSH projects with leasing dollars can begin facilitating shared housing arrangements immediately, via sub-lease agreements; 4) Clarifying expectations around how the shared housing arrangement will work. Shared housing agreements can help clarify expectations. These agreements can cover anything from house rules, visitor expectations, sharing of bills (food, utilities, etc.), and more.
- Projects should follow HUD guidance on calculating rent contributions in shared housing<sup>63</sup>.

## Performance Measures

The CoC has established the following performance goals for PSH Projects:

- At least 96% of households in PSH retain their housing or exit to permanent housing. (FY23 CoC System Performance Measures)
- No more than 6% of households that exit to permanent housing after being homeless should become homeless again within 12 months. (FY23 CoC System Performance Measures)
- At least 48% of adults served by PSH Projects will increase their income through either employment or benefits; 22% will increase earned income and 30% will increase non-employment income. (FY23 CoC System Performance Measures)
- At least 60% of households served under a PSH Project will be linked to mainstream resources. (2024 CoC Renewal Scoring)

## **RAPID REHOUSING (RRH)**

The standards adopted for RRH apply to projects funded under both ESG and CoC unless otherwise noted. RRH is an intervention designed to help individuals and families quickly exit homelessness and return to permanent housing. RRH assistance is offered without preconditions — like employment, income, absence of criminal record, or sobriety — and the resources and services provided are tailored to the unique needs of the household.

### Access

All referrals to RRH must come through CE.

### Eligibility

The following categories of individuals or families are eligible for RRH:

- Category 1: Literally Homeless

<sup>62</sup> [https://www.wiboscoc.org/uploads/3/7/2/4/37244219/wi\\_bos\\_guide\\_on\\_shared\\_housing.pdf](https://www.wiboscoc.org/uploads/3/7/2/4/37244219/wi_bos_guide_on_shared_housing.pdf)

<sup>63</sup> <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-rent-calculation/rent-calculation-process/>. HUD published guidance related to shared housing in HOPWA projects – the general guidance also applies to CoC projects: <https://files.hudexchange.info/resources/documents/SharedHousingRentCalculation.pdf>.

- Category 4: Fleeing/Attempting to Flee Domestic Violence\*  
AND
- Must be unable to access housing without assistance

\*Currently under ESG, Category 4 households must also meet the requirements of Category 1; and for CoC-funded RRH funded prior to 2015, households must also meet the requirements of Category 1. An individual or family that qualifies as homeless under Category 4 but does not meet Category 1 as well would not be eligible for ESG RRH assistance but may be eligible for ESG HP assistance. (24 CFR 576.104<sup>64</sup>)

There are no income eligibility requirements for households at the time of initial eligibility/enrollment.

Regarding Chronic Status: Participants who were chronically homeless prior to RRH entry maintain their chronically homeless status while they are receiving RRH.

**Prioritization**

All CoC- and ESG-funded projects are required to prioritize households with the longest history of homelessness and with the most severe service needs for all available CoC resources through regional CE case conferencing. The determination of severe service needs will be based on the Housing and Service Needs Assessment Score, CE Assessment Tool Score<sup>65</sup>, and information presented during regional case conferencing.

Order of Prioritization for RRH Projects:

<b>Priority Bracket</b>	<b>Criteria</b>	<b>Tie-Breaker</b>
First Priority	Special populations designated by the CoC	HN/SN Score, LOT Homeless, then CE Assessment Tool score
Second Priority	People experiencing chronic homelessness	HN/SN Score, LOT Homeless, then CE Assessment Tool score
Third Priority	All eligible households not included under First Priority or Second Priority	HN/SN Score, LOT Homeless, then CE Assessment Tool score

For households transferring into RRH from other housing projects, if the household was chronically homeless at entry into their current project, the household will be prioritized in the Second Priority Bracket. Within each priority bracket, it will be determined via case conferencing where a transferring household will be prioritized compared to currently homeless households.

<sup>64</sup> <https://www.law.cornell.edu/cfr/text/24/576.104>

<sup>65</sup> As of fall 2024 the CoC is using the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the quantitative CE assessment tool. However, this is subject to change.

\*The CoC is committed to participant choice. Therefore, in applying the order of priority, households shall be considered for all counties they have expressed interest in via the CE assessment, and all counties in the region where they are currently experiencing homelessness.

^While TH to RRH transfers are eligible under the order of priority, TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH. Therefore, TH residents will not be prioritized for RRH transfers (except specifically TH-RRH projects) unless there are no other eligible chronically homeless households for the available RRH opening.

**Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:** If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix D).**

## Documentation

Relevant documentation standards include the information presented in the “Documentation for All Project Types” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- For ESG-funded RRH, the **Documentation of Homelessness (See Templates for CoC and ESG related programs Supplemental Resource)** must be completed to enrollment of a household into a RRH Project.
- For ESG-funded RRH, an executed **Landlord-agency Agreement (See Templates for CoC and ESG related programs Supplemental Resource)** must be on file. Projects must offer a standard, basic level of support to all landlords who lease to project participants as detailed in a written agreement that should be signed by the Case Manager or Housing Locator and the landlord. At a minimum, this agreement should specify that the Case Manager and/or Housing Locator will:
  - Inform the landlord about the amount and duration of financial assistance being provided to the participant;
  - Respond quickly (ideally within one business day) to landlord calls about serious tenancy problems;
  - Seek to resolve conflicts around lease requirements, complaints by other tenants, and timely rent payments; and,
  - If necessary, help negotiate move-out terms and assist the participant to quickly locate and move into another unit without an eviction.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The **Lease (see sample in Templates for CoC and ESG related programs Supplemental Resource)** must include:
  - Renter's name and property address;
  - Landlord's name and address;

- Lease start and end dates;
- Monthly rent amount (including the prorated amount for the first month if a partial month);
- Security deposit amount (if any);
- Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
- Signatures of both parties.
- HUD-91067 VAWA Lease Addendum<sup>66</sup>
- Other documents required in all case files:
  - Passed Inspection (Minimum Habitability Standards and Lead-Based Paint for ESG-funded RRH and Housing Quality Standards for CoC-funded RRH). The passed inspection must be dated BEFORE the lease and, for ESG, before the landlord-agency agreement is dated and executed.
  - **Housing Plans (see Templates for CoC and ESG related programs Supplemental Resource)** are required. RRH Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family reunification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.

## Duration and Amounts

The amount of rental assistance provided is highly individualized, but should generally titrate down (i.e., lessen) the level of RRH subsidies over time so that each household contributes more as they are able to and as stabilization is realized. Participants may receive approval for the minimum amount of rental assistance necessary to prevent a return to homelessness.

Participants will not be approved for more rental assistance than can be justified with their income and expenses at any given time. The actual level of assistance and duration offered varies depending on need and will be decided upon by the participant and the Case Manager. Generally, over time, (barring unforeseen circumstances) the project will pay less toward rent while the participant pays more, until such time as the participant, is paying in full and exits the project. However, if income cannot increase substantially enough, the household cannot afford rent in full, and there is substantial reason to believe that the participant will obtain another form of permanent housing subsidy (i.e., HCV, PSH, etc.) the household may only be held accountable for a rent amount comparable to what they can expect to pay upon discharge from the RRH project.

Since rental and/or financial assistance is to match the needs of the household, the duration of assistance will vary by household, lasting for no longer than the household needs to stabilize. That said, most households should be stabilized within an average timeframe of 12 months or less. -Some extenuating circumstances may necessitate extending RRH assistance past 12 months. Reasonable extension justifications could include:

- A participant with recent job loss
- Transition Aged Youth

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<sup>66</sup> <https://www.hud.gov/sites/documents/91067.doc>

- A participant paying fines
- A participant recently incarcerated, hospitalized, etc.
- A participant waiting for a PSH unit, HCV, etc. and there is reason to believe that it can be obtained before the maximum time allowed for RRH.

Projects should create their own internal extension approval process for any households remaining in the project past 12 months, and should include regular internal extension reviews past 12 months (e.g., 15 months, 18 months, 21 months). If average length of stay within an RRH project exceeds 12 months, the CoC may engage the provider to offer technical assistance.

In no instances will a household receive more than 24 months of RRH assistance in any 3-year period, and no fees can be imposed on project participants beyond payment of rent.

Keeping this general framework in mind, following are additional standards for projects and participants in RRH:

- First month's rent can be offered in full to assist the household. In the event the first month is prorated, the first full month may also be paid in full, if commensurate with the household's need, and security deposits cannot exceed 2 months of actual rent.
- If, under the terms of the lease, the participant is responsible for paying their own utilities, grantees must follow the requirements for utility payments and reimbursement per Notice: CPD-17-11<sup>67</sup>:
  - CoC interim rule explicitly requires RRH projects to calculate rent as the sum of the total monthly rent for the unit and, if the participant pays separately for utilities, the monthly allowance for utilities established by the public housing authority (PHA) for the area in which the housing is located.
  - For the purposes of determining the reasonable monthly utility consumption, Projects must use the local PHA's schedule of utility allowances, which are based on unit size and the utilities the project participant is expected to pay. Grantees should contact their PHA to obtain the schedule of utility allowances and exception utility allowances.
- For ESG-funded projects, unit rent must NOT exceed Fair Market Rent (FMR) AND it must not exceed Rent Reasonableness. For CoC-funded Projects, unit rent may exceed FMR, but it may not exceed Rent Reasonableness. This means that a recipient or subrecipient is allowed to pay rents up to the rent reasonable amount even if this is higher than the FMR. If rent reasonableness rates are lower than FMR, the maximum allowable contract rent amount is still capped at rent reasonableness rates.
- Additional costs may be covered to assist households enrolled in RRH, but projects should refer to their actual grant application and NOFO/Project guidelines applicable to the contract year(s) they are funded for.
- In some cases (approved by CoC Governing Board and/or CoC Funding Committee), CoC RRH funds can be used for Rapid Exits. Through Rapid Exits, RRH funds can be used from day 1 of a household's contact with Coordinated Entry during the Diversion and Rapid Exit Phases of CE for one-time financial assistance (such as first/last/security deposit/utility deposit) and light-touch case management focused on housing search and ensuring a household is connected to the mainstream benefits and resources they qualify for (Medicare, Medicaid, SSI, Food Stamps/ SNAP, local Workforce office, early childhood education, TANF, substance use disorder programs,

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<sup>67</sup> <https://www.hudexchange.info/resource/5630/notice-cpd-17-11-determining-program-participant-rent-contribution-in-the-coc-program/>

employment assistance programs).

- Rapid Exit funds are prioritized for households with a source of income who need minimal financial assistance to exit homelessness, and who have identified a unit or are in the process of identifying a unit, and do not require ongoing supportive services/ case management. Rapid Exit funds may be used to assist households with housing search.
- Households identified for Rapid Exits are not required to go through the full CE prioritization, case conferencing, and referral process.

## Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards. Additional minimum standards for this project type include:

- Households should be enrolled into rapid re-housing once it is mutually agreed upon (by the participant and the provider) that the two parties will be working toward permanent housing together. Providers should not wait until permanent housing is found to enroll the household.
- Exit planning should start upon Project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy or with a permanent subsidy resource such as Public Housing, Housing Choice Vouchers, affordable housing developments, etc. **(Housing Plan Template- See Templates for CoC and ESG related programs Supplemental Resource)**
- Income is reassessed at least quarterly for the purposes of adjusting rental payments. Although these income assessments should be accounted for in HMIS, they generally will not have a bearing on eligibility (apart from the Annual Assessment, at which time the household must fall within eligible income limits to be minimally eligible for continued RRH assistance). Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Conversely, if the household has not reached stabilization yet, they may still obtain RRH assistance, regardless of their actual income at non-Annual, quarterly Assessments. Some indicators of stability could be:
  - Goals cited in previously created goal plans will be realized
  - The household will be paying rent in full (or to the level agreed upon as described above)
  - The housing crisis is resolved
  - The household feels as though they have enough supports in place to maintain stabilization without ESG’s essential services
- Provide housing locator services. While the amount of assistance related to housing search varies by provider, at a minimum this should include:
  - Recruitment of landlords to provide housing opportunities for individuals and families experiencing homelessness
  - Provide education and outreach to landlords to address potential barriers to their participation
  - Assist households to find and secure appropriate rental housing. This may include such assistance as developing lists of participating landlords and rental units and accompanying participants on their housing search
  - Help individuals and families negotiate manageable and appropriate lease agreements with landlords
  - In general, some households may need more intensive assistance with housing search than others, due to barriers to tenancy (such as criminal record) or lack of experience with rental housing in the past. RRH providers should be prepared to provide more

assistance to households who may need a higher level of support to identify an eligible unit. This may include:

- Assisting the household to look up eligible units online or via other local resources.
- Assisting the household in calling landlords to inquire about available units.
- Accompanying the household to view unit and meet with landlords.
- Assisting the household in reviewing and understanding lease terms.

## Case Management

Relevant minimum standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy.
- Case management meetings are required monthly, although additional meetings can always be offered by the case manager as needed and/or scheduled as requested by the participant. Meetings should be in the participant’s home or in a mutually agreed-upon community setting, as opposed to an office setting, to the greatest extent possible.
- Shared Housing arrangements are allowable in RRH, and providers are encouraged to explore and support these arrangements if this would support the long-term housing stability of project participants<sup>68</sup>. Shared Housing arrangements may be particularly helpful in areas with high cost of living where renting an SRO or 1BR apartment may not be financially viable long term for individual participants.
  - Shared housing is broadly defined as a living situation where two or more individual or family units share a single housing unit. This includes sharing housing costs like rent and utilities. Each individual or family unit has their own personal space, but there are common spaces that are shared such as bathrooms, kitchen and living room. Housing units can be any unit with multiple bedrooms. It can be an apartment or an entire building. The homeowner can live on the premises or not, but if the homeowner is related to the tenants, CoC and ESG dollars cannot pay rent.
  - A one-bedroom unit cannot be used for shared housing. Shared housing is not the same as doubled up. Each individual or family unit has their own space, holds their own lease and resides in housing that is permanent.
  - In a shared housing arrangement, each individual or family unit must hold their own lease.
  - 4 keys to implementing a successful shared housing model<sup>69</sup>: 1) Identifying households who may be interested in shared housing; 2) Developing a process that matches appropriate people together, driven by client choice; 3) Engaging landlords who are amenable to split lease scenarios and streamlining the process as much as possible for landlords; 4) Clarifying expectations around how the shared housing arrangement will work. Shared housing agreements can help clarify expectations. These agreements can cover anything from house rules, visitor expectations, sharing of bills (food, utilities, etc.), and more.

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<sup>68</sup> <https://endhomelessness.org/blog/how-master-leasing-can-help-the-affordable-housing-crisis/>

<sup>69</sup> [https://www.wiboscoc.org/uploads/3/7/2/4/37244219/wi\\_bos\\_guide\\_on\\_shared\\_housing.pdf](https://www.wiboscoc.org/uploads/3/7/2/4/37244219/wi_bos_guide_on_shared_housing.pdf)



- Projects should follow HUD guidance on calculating rent contributions in shared housing<sup>70</sup>.
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## **Performance Measures**

The CoC has established the following performance goals for RRH Projects:

- At least 88% of households who exit RRH exit to permanent housing. (FY23 CoC System Performance Measures)
- No more than 6% of households that exit to permanent housing after being homeless should become homeless again within 12 months. (FY23 CoC System Performance Measures)

At least 48% of adults will increase their income through either employment or benefits; 22% will increase earned income and 30% will increase non employment income. (FY23 CoC System Performance Measures) At least 60% of households will be linked to mainstream resources. (2024 CoC Renewal Scoring)

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## **TRANSITIONAL HOUSING (TH)**

TH facilitates the movement of individuals and families experiencing homelessness to permanent housing.

The standards adopted for TH will apply to projects funded under the CoC. These standards will also apply to the TH portion of CoC-funded joint TH/RR Projects, except where the TH/RR section of the CoC’s Written Standards indicate there is difference.

Enrollment is always based on participant choice in conjunction with an assessment of health and safety needs. TH should be as low barrier as possible while honoring eligibility and prioritization criteria as outlined below.

### **Access**

All households access HUD-funded TH Projects via CE and should be offered the option with as few barriers to project entry as possible.

### **Eligibility**

The following categories of individuals or families are eligible for HUD-funded TH services:

- Category 1: Literally Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence
- AND
- Households must either present with multiple barriers to obtaining and retaining housing or have one primary barrier other than financial (people whose primary barrier to housing stability is economic in nature do not require TH).

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<sup>70</sup> <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-rent-calculation/rent-calculation-process/>. HUD published guidance related to shared housing in HOPWA projects – the general guidance also applies to CoC projects: <https://files.hudexchange.info/resources/documents/SharedHousingRentCalculation.pdf>.

HUD-funded projects should refer to NOFO for the year they were funded since the above categories are subject to change.

Non-HUD funded TH Projects may serve Categories 1, 2, 3 and 4<sup>71</sup>, or per their established eligibility requirements.

Regarding Chronic Status: A household enrolled in TH for longer than 7 days loses their Chronic Homelessness status. The only exception is a household that is unsheltered and eligible for PSH may be provided a bed in a TH facility for up to 7 days if ES and Hotel Vouchers are unavailable. During these 7 days, they are not enrolled in the actual TH project and do not lose their Chronic designation. The household must comply with basic project rules related to occupancy but does not participate in the project (e.g., job training, life skills, etc.).

**Prioritization**

TH should be targeted to people who face more severe challenges to finding housing.

All CoC and ESG funded projects are required to prioritize households with the longest history of homelessness and with the most severe service needs for all available CoC resources through regional CE case conferencing. The determination of severe service needs will be based on the Housing and Service Needs Assessment Score, CE Assessment Tool score<sup>72</sup>, and information presented during regional case conferencing.

Order of Prioritization for TH Projects:

<b>Priority Bracket</b>	<b>Criteria</b>	<b>Tie-Breaker</b>
First Priority	Special populations designated by the CoC	HN/SN Score, LOT Homeless, then CE Assessment Tool score
Second Priority	People experiencing chronic homelessness	HN/SN Score, LOT Homeless, then CE Assessment Tool score
Third Priority	All eligible households not included under First Priority or Second Priority	HN/SN Score, LOT Homeless, then CE Assessment Tool score

Because TH may serve as crisis housing, if there are no chronically homeless households prioritized for a project, the project may, through CE case conferencing, prioritize households facing emergency situations, such as high lethality DV situations.

For households transferring into TH from other housing projects, if the household was chronically homeless at entry into their current project, the household will be prioritized in the Second Priority Bracket. Within each priority bracket, it will be determined via case conferencing where a transferring household will be prioritized compared to currently homeless households.

<sup>71</sup> Category 3 is ineligible in the Western PA CoC at this time.

<sup>72</sup> As of fall 2024 the CoC is using the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the quantitative CE assessment tool. However, this is subject to change.

\*The CoC is committed to participant choice. Therefore, in applying the order of priority, households shall be considered for all counties they have expressed interest in via the CE assessment, and all counties in the region where they are currently experiencing homelessness.

***^TH residents who were chronically homeless prior to entering TH are no longer considered chronically homeless upon entering TH.*** It will be important for the TH Provider and CE Assessment Center to assist the household in making an informed decision (explaining other services they may be eligible for and what they may forfeit if accepting a TH enrollment and helping the household navigate the likelihood of being connected to these other, potentially more appropriate resources). Households who are chronically homeless who are being referred to TH should be discussed at case conferencing, to ensure the household makes an informed decision about accepting a TH placement.

**Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:** If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix D).**

### **Documentation**

Relevant documentation standards include the information presented in the “Documentation for All Project Types” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Executed Occupancy Agreement and any extensions, if applicable

### **Duration and Amounts**

While TH may be used to cover the costs for up to twenty-four months of housing with accompanying supportive services, it is intended to be used as bridge housing (i.e., temporary housing when shelter is unavailable or the participant is preparing to enroll in permanent housing), not exceeding twelve months, except in extenuating circumstances, with an average target of a six-month stay per household. Ideally, stays will not exceed 90 days, lasting for only as long as it takes for a household to secure permanent housing. The actual length of stay for a particular household will vary based on their specific needs and the availability of affordable permanent housing resources.

Longer-term TH, in excess of six months or twelve months, should be targeted to people who face more severe challenges to finding housing.

For CoC-funded projects, to determine rent/occupancy charges, if rental assistance is being applied (as opposed to leasing dollars), the rent contribution or the maximum occupancy charge is the highest of the following amounts (rounded to the nearest dollar):

- 30% of the family’s monthly adjusted income (as outlined at Part 5.609 and 5.611(a));
- 10% of the family’s monthly gross income; or
- If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family’s actual housing costs) is specifically designated by the agency to meet the family’s housing costs, the portion of the payments that is designated for housing costs.

Please keep in mind that for TH projects in which rental assistance is provided, the rent contribution is not optional and must equal the rent contribution specified above. For projects that provide TH using funds other than rental assistance funds, the occupancy charge is optional and can be lower, but not higher, than the maximum occupancy charge specified above.

### **Minimum Standards**

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards.

### **Case Management**

Relevant case management standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon Project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy (**Housing Plans- See Templates for CoC and ESG related programs Supplemental Resource**).
- Case Managers offer to meet with participants at least bi-weekly (this stipulation supersedes any language requiring case managers to offer meeting only monthly).

### **Performance Measures**

The CoC has established the following performance goals for TH projects:

- At least 83% of households who exit TH exit to permanent housing. (2024 CoC Renewal Scoring)
- No more than 6% of households that exit to permanent housing after being homeless should become homeless again within 12 months. (FY23 CoC System Performance Measures).
- At least 48% of adults will increase their income through either employment or benefits; 22% will increase earned income and 30% will increase non employment income. (FY23 CoC System Performance Measures) TH Project will have an average stay of 12 months or less (target goal: 9 months of less). (2024 CoC Renewal Scoring)

### **JOINT TRANSITIONAL HOUSING/RAPID REHOUSING (TH-RRH)**

A Joint TH/RRH Component project is a project type that includes two existing project components—TH (TH) and RRH (RRH)—in a single project to serve individuals and families experiencing homelessness. Generally, TH-RRH can be appropriate in areas with low ES housing stock, and emphasis should be on rapid movements from TH to permanent housing (short Length of Stay).

Projects administering Joint TH/RRH projects should defer to the “RRH” and “TH” sections of the CoC’s Written Standards. The areas which deviate from those standards or have additional nuances associated with them for the Joint TH/RRH project type addressed below.

### **Access**

All households access HUD-funded Joint TH/RRH Projects via CE. Projects must offer both components: participants are able to choose what housing setting makes the most sense, which may include TH Only, RRH only, or TH and RRH. The choice should be driven by participant choice and needs.

### **Eligibility**

The following categories of individuals or families are eligible for Joint TH/RRH services:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence
- Those residing in a TH project that is being eliminated
- Those residing in TH being funded by another Joint Component project

### **Prioritization**

Projects should target and prioritize people experiencing homelessness with higher needs (i.e., multiple barriers to obtaining and retaining housing and/or those who are most vulnerable). A more lenient prioritization may be used if the Joint TH/RRH project exists to fill an emergency placement gap (i.e., the household would remain unsheltered if not for enrollment into the project).

All CoC-funded projects are required to prioritize households with the longest history of homelessness and with the most severe service needs for all available CoC resources through regional CE case conferencing. The determination of severe service needs will be based on the Housing and Service Needs Assessment Score, VISPDAT Score, and information presented during regional case conferencing.

Please see “TH” and “RRH” sections related to Order of Prioritization for these project types. TH-RRH projects should follow the Order of Prioritization for TH and RRH projects, depending on which project component participant will be entering.

### **Documentation**

Relevant documentation standards include the information presented in the “RRH,” “TH,” and “Minimum Standards for All Project Types” sections of the CoC’s Written Standards.

### **Duration and Amounts**

The maximum duration of support for both components combined is 24 months per household.

### **Minimum Standards**

All applicable minimum standards are shared in the “RRH,” “TH,” and “Minimum Standards for All Project Types” sections of the Written Standards. Additional minimum standards for this project type include:

- The project will provide enough RRH assistance to ensure that at any given time a project participant may move from TH to permanent housing (rule of thumb: there should be twice as

many RRH than TH at any point in time, but variations can be found if appropriate for the population served).

HMIS/reporting requirements:

- TH/RRH projects must be set-up in HMIS data system as two-different Projects: one TH project and one RRH project
- CoC-funded TH/RRH must submit one APR for TH and one APR for RRH.

### **Case Management**

Relevant minimum standards include the information presented in the “RRH,” “TH,” and “Case Management Standards for All Project Types” sections of the CoC’s Written Standards.

Additional case management standards for this project type include:

- For projects with operating or leasing dollars where occupancy agreements or sub-leases are used, the role of the case manager and the role of landlord should be separate and distinct to ensure the case manager can engage with the participant to build trust and rapport instead of focusing on holding the participant accountable to their lease.

### **Performance Measures**

Relevant minimum standards include the information presented in the “RRH” and “TH” sections of the CoC’s Written Standards.

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### **HOMELESS PREVENTION (HP)**

Housing stability is the primary goal of HP. ESG funds may be used to provide housing relocation and/or stabilization and services and rental assistance to prevent an individual or family from moving into an ES, safe haven, or other place not meant for human habitation. **ESG HP is not an eviction prevention project.** It is intended to prevent households from losing all housing and ending up in ES or on the street. *Non-ESG-funded prevention projects are encouraged to also follow these standards.*

#### **Access**

Households will be screened for prevention resources through CE. If a household is identified at risk of homelessness (per HMIS assessment), CE assessor will refer to prevention providers in their county. These households will NOT be added to the Prioritization List/BNL.

There may be more than one prevention provider in the county (e.g., ESG; PHFA; SSVF HP, etc.). The CE assessor should refer the participant to all prevention resources for which they are eligible. The CE assessor should make every attempt to make a "warm handoff" directly to a prevention provider agency. *\*Note: CE assessor may be the prevention provider for the county. If so, can make referral within their own agency.*

Upon receipt of referral, prevention providers will screen participants for eligibility. If a prevention provider receives ESG funds they will use the **ESG HP Screening Workflow in HMIS** to prioritize

households for HP assistance, as directed by DCED/the CoC. Prevention providers who receive other funding sources are also encouraged to use the Prevention Screening tool.

Participants fleeing DV/attempting to flee DV may be eligible for EITHER HP OR RRH resources, per HUD eligibility guidance (\*see note under “Eligibility” section for more information). A DV Assessment Center may make referrals based on participant choice and resource availability. If referral to prevention resources is appropriate, a DV assessment center may make referral to HP resources (including DV-specific resources)

## Eligibility

The following categories of individuals or families are eligible for HP services:

- Category 2: Imminent Risk of Homeless; or
  - Category 4: Fleeing/Attempting to Flee Domestic Violence\*; or
  - At-risk of homelessness as defined at 24 CFR 576.2<sup>73</sup>;
- AND
- Households must be very-low income: gross annual income must be less than 30% of area median income based on the income limits most recently published by HUD<sup>74</sup>.

Some households who apply for ESG HP assistance may be losing their housing, but they have another safe and appropriate housing option – including temporary options – where they can stay while they work to obtain their own housing. An applicant may also have another resource they can use to maintain current housing or obtain new housing. Such applicants would not be considered at imminent risk of literal homelessness.

**\*A household that qualifies as homeless under Category 4 but does not live in an ES or other place described in paragraph (1) of the 'homeless' definition would not be eligible for ESG rapid re-housing assistance but may be eligible for ESG HP assistance.** Additionally, if the household meets the criteria under either Category 2 or 3 of the homeless definition or the criteria under the at-risk definition, the household may be eligible for HP assistance.

Note: not all HP households will remain in the same unit. Some may require relocation services (for example, if a landlord still wants to evict even if payment is offered). In these cases, no arrears should be paid, and the household should be rehoused within the HP project (as opposed to RRH).

## Prioritization

Generally, resources are to be prioritized for households who would otherwise be on the streets or in an ES. In general, prevention projects should utilize the following Order of Prioritization, in addition to using the Western PA HP Screening Form as outlined below.

### Order of Prioritization for HP Projects:

1. Category 2 - Homeless with a court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance
2. Category 2, 3, or 4 Homeless
3. At-risk of homelessness as defined at 24 CFR 576.2<sup>75</sup>;

<sup>73</sup> <https://www.law.cornell.edu/cfr/text/24/576.2>

<sup>74</sup> <http://www.huduser.org/portal/datasets/il.html>

<sup>75</sup> <https://www.law.cornell.edu/cfr/text/24/576.2>

HP Providers should identify households, through both CE and direct referrals. ESG HP providers should prioritize households by utilizing the **ESG HP Screening Workflow in HMIS**.

**Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:** If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix D)**.

## Documentation

Relevant documentation standards include the information presented in the “Documentation for All Project Types” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- For ESG-funded HP, the **Documentation of Homelessness (See Templates for CoC and ESG related programs Supplemental Resource)** must be completed and prior to enrollment of a household into an HP project.
- For ESG-funded HP, an executed **Landlord-agency Agreement (See Templates for CoC and ESG related programs Supplemental Resource)** must be on file. Projects must offer a standard, basic level of support to all landlords who lease to project participants as detailed in a written agreement that should be signed by the Case Manager or Housing Locator and the landlord. At a minimum, this agreement should specify that the Case Manager and/or Housing Locator will:
  - Inform the landlord about the amount and duration of financial assistance being provided to the participant;
  - Respond quickly (ideally within one business day) to landlord calls about serious tenancy problems;
  - Seek to resolve conflicts around lease requirements, complaints by other tenants, and timely rent payments; and,
  - If necessary, help negotiate move-out terms and assist the participant to quickly locate and move into another unit without an eviction.
- An executed lease must be on file covering the time any financial or rental assistance is being provided. The **Lease (see example in Templates for CoC and ESG related programs Supplemental Resource)** must include:
  - Renter’s name and property address;
  - Landlord’s name and address;
  - Lease start and end dates;
  - Monthly rent amount (including the prorated amount for the first month if a partial month);
  - Security deposit amount (if any);
  - Which party is responsible for each utility and, if necessary, any legal fees to be incurred; and,
  - Signatures of both parties.



- HUD-91067 VAWA Lease Addendum<sup>76</sup>
- Other documents required in all case files:
  - Passed Inspections (Minimum Habitability Standards and Lead-Based Paint)- Note: for ESG-funded HP, the passed inspection must be dated BEFORE the lease and landlord-agency agreement are dated and executed. For rental arrears, the date of the lease needs to be before the inspection.
  - **Housing Plans (See Templates for CoC and ESG related programs Supplemental Resource)** are required. HP Case Managers should work with project participants to develop a written strengths-based, consumer-driven housing plan to help them achieve permanent housing stability. The plan may include goals related to childcare, employment, family re-unification, financial stability, health, housing, legal issues, and other concerns as appropriate. The plan must include a goal to sustain housing following the end of project assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan should be monitored and updated at regular intervals. A copy of the current plan should be given to the participant and kept in their file.
- If rental arrearages are being paid, there must be proof of funds owed and that the landlord will cease eviction proceedings if paid.
- If utility arrearages are being paid, there must be proof of pending shut-off, that the household is responsible for utilities per the lease, and that the bill is in the participant's name at the address on the lease.

### Duration and Amounts

HP providers are required to provide the Access and Diversion phase of CE, using a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one-time payments and short-term housing assistance, to identify the lightest-touch method to successfully eliminate each participant's barriers to remaining in safe, stable permanent housing.

If diversion techniques are unsuccessful, HP projects are required to connect households to emergency services, including emergency shelter.

The amount of rental assistance provided is highly individualized, but should generally titrate down (i.e., lessen) the level of HP subsidies over time so that each household contributes more as they are able to and as stabilization is realized. Participants may receive approval for the minimum amount of rental assistance necessary to stabilize their housing crisis.

Participants will not be approved for more assistance than can be justified with their income and expenses at any given time. The actual level of assistance and duration offered varies depending on need and will be decided upon by the participant and the case manager. Generally, over time, (barring unforeseen circumstances) the project will pay less toward rent while the participant pays more, until such time as the participant, generally, is paying in full and exits the project. However, if income cannot increase substantially enough, the household cannot afford rent in full, and there is substantial reason to believe that the participant will obtain another form of permanent housing subsidy (i.e., HCV) the household may only be held accountable for a rent amount comparable to what they can expect to pay upon discharge from the HP project.

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<sup>76</sup> <https://www.hud.gov/sites/documents/91067.doc>

Since rental and/or financial assistance is to match the needs of the household, the duration of assistance will vary by household, lasting for no longer than the household needs to stabilize. That said, most households should be stabilized within an average 6-month timeframe. However, in some instances a subsidy may be needed for longer than 6 months, in which case an extension approval from the Project Manager should be obtained if the household still would qualify in terms of their income. Projects are to create their own internal extension approval process to be completed in writing at 6 and 9 months, if justified. Projects should create their own internal extension approval process for any households remaining in the project past 12 months, and should include regular internal extension reviews past 12 months (e.g., 15 months, 18 months, 21 months).

Reasonable extension justifications include serving:

- A participant with recent job loss
- Transition Aged Youth who need additional support to obtain housing stability
- A participant paying fines
- A participant recently incarcerated, hospitalized, etc.
- A participant waiting for a HCV, and there is reason to believe that it can be obtained before the maximum time allowed for HP.

In no instances will a household receive more than 24 months of prevention assistance in any 3-year period, and no fees can be imposed on project participants beyond payment of rent.

Keeping this general framework in mind, following are additional standards for projects and participants in HP related to duration and amounts of support:

- Rental or utility arrearages of up to 6 months may be paid if doing so will stop an eviction and prevent homelessness. The total arrearages may be more, in which case, additional funds can be used, or the landlord may opt to forgive that debt or create a repayment plan with the household.
- First month's rent after enrollment can be offered in full to assist the household. In the event the first month is prorated, the first full month may also be paid in full, if commensurate with the household's need, and, in the event the household relocated, security deposits cannot exceed 2 months of actual rent.
- Unit rent may not exceed either FMR or Rent Reasonableness.
- Additional costs may be covered to assist households enrolled in HP, but projects should refer to their actual grant application guidelines applicable to the contract year(s) they are funded for.

## **Minimum Standards**

Relevant minimum standards include the information presented in the "Minimum Standards for All Project Types" section of the CoC's Written Standards. Additional minimum standards for this project type include:

- Income is reassessed quarterly for the purposes of eligibility and adjusting rental payments. Please note, if the household identifies as stabilized, they may be successfully discharged at any time. Some indicators of stability could be:
  - Goals cited in previously created goal plans will be realized.
  - The household will be paying rent in full (or to the level agreed upon as described above)
  - The housing crisis is resolved
  - The household feels as though they have enough support in place to maintain stabilization without ESG's essential services.

## Case Management

Relevant case management standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon project entry with regular discussions about moving towards maintaining housing stability without a rental subsidy (**Housing Plan- See Templates for CoC and ESG related programs Supplemental Resource**)
- Working with households to develop a Housing Stability Plan that includes review of the affordability of the household’s housing unit and the possibility of moving to a more affordable living situation. (**See Templates for CoC and ESG related programs Supplemental Resource for Housing Plan Template**)
  - The Housing Stability Plan should be reviewed monthly and revised every 3 months

## Performance Measures

Although CoC-wide performance measures do not exist for this project type, projects are required to submit project-level measures/benchmarks with ESG applications and should refer to what they stated in their applications.

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## **EMERGENCY SHELTER (ES)**

An ES is any facility, the primary purpose of which is to provide a temporary shelter for households experiencing homelessness and which does not require occupants to sign a lease or occupancy agreement. The goal for all ES’s is to exit households to permanent housing as quickly as possible. Upon admission to ES, all households should be entered into CE to expedite exit to permanent housing resources. It is the CoC’s goal that all ES, regardless of funding source, will follow the CoC’s written standards. *Non-ESG-funded ESs are encouraged to also follow these standards.*

### **Access**

ES may accept participant referrals from CE, other agencies, or from the participants themselves (i.e., self-referral/participant reaches out for services). ES projects are required to provide the Access, Diversion, Assessment, Prioritization, and Referral phases of CE, as described in the CE Policies and Procedures. ES projects are required to provide the Prevention phase of CE only to the extent necessary to determine that a participant is not experiencing literal homelessness and refer them to an appropriate service provider. If funded to do so, ES projects must also provide the Prevention and Rapid Exit phases of CE.

During the Access and Diversion phase of CE, shelter intake staff should explore all options prior to enrolling a household in ES, including problem-solving conversations, identifying community supports, and offering lighter touch solutions. If ES projects are funded to provide the Prevention and Rapid Exit phases of CE, they must use a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one-time payments and short-term housing assistance, to identify the lightest-touch method to successfully eliminate each participant’s barriers to remaining in safe, stable permanent housing.

There should be coordination among those operating prevention Projects, including ESG, HAP, HOME4Good, PHARE, ESG-CV, etc.

Victims of Domestic Violence, dating violence, sexual assault, and stalking: To the extent possible, these households will be referred to the local domestic violence agency for safe shelter. When not feasible, shelter providers will work with their local domestic violence agency to develop protocols to meet their safety needs.

### **Eligibility**

The following categories of individuals or families are eligible for ES services:

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 4: Fleeing/Attempting to Flee Domestic Violence

To the maximum extent possible, shelters should avoid discharging guests except when the guest poses a danger to themselves or other shelter residents; discharging guests should be a last resort when there are no other viable options available. ES *may* deny entry or future stays only for the reasons listed below. In these situations, alternative shelter must be identified.

- Violence towards other guests or staff
- Excessive damage to property
- Theft from the shelter or other guests
- Need for medical services beyond those the shelter is equipped to provide
- For an individual in shelter who has a Protection From Abuse order, the abuser named in this order may be denied entry to the shelter. Any known abuser of a current resident will not be allowed access to the site, even if there is not an active Protection from Abuse order.
- Sex offender registered on Megan’s Law list, if the shelter provides services to families/children or if the location of the shelter will not allow the participant to reside there (e.g., proximity to school).

### **Prioritization**

Each shelter will be responsible for establishing their own prioritization standards, including serving on a first-come, first-served basis.

**Regarding Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking:** If a participant/household has requested an emergency transfer due to domestic violence, dating violence, sexual assault, human trafficking, or stalking, “the provider must act as quickly as possible to move a participant, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a unit, either within the provider’s own inventory or through a transfer facilitated through the Western PA CoC’s Coordinated Entry System.” If a unit is not available within the provider’s own inventory, the provider should follow the process outlined in the Emergency Transfer Plan. Emergency transfer requests may be expedited and prioritized in order to identify a housing resource for which the participant/household is eligible as soon as possible. The goal is to move the participant to a new unit within 10 business days. See **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix D).**

### **Documentation**

Relevant documentation standards include the information presented in the “Documentation Standards for All Project Types” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Completing and uploading the **Documentation of Homelessness and homeless documentation (See Templates for CoC and ESG related programs Supplemental Resource)** to HMIS prior to enrollment of a household into ESG-funded Projects.
- Completing the **Homeless Certification (See Templates for CoC and ESG related programs Supplemental Resource)** to be used when coordinating with a permanent housing provider.
- Working with participants to obtain their necessary documentation, if applicable (i.e., Social Security cards, birth certificates, chronic status verification, etc.). These efforts would be documented in the case files along with any additional case notes.

### **Duration and Amounts**

The CoC has not established a maximum length of stay in ES. However, the goal is for households to remain in shelter for the shortest time possible to stabilize housing. Shelters should provide flexibility related to length of stay based on individual needs, recognizing factors that may necessitate a longer length of stay such as awaiting housing through the CoC’s CE process. Shelters should maintain a housing-focused approach when working with participants.

ES should not charge fees to participants.

### **Minimum Standards**

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards. Additional minimum standards for this project type are:

- Engaging participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement back into permanent housing.
- Discharging, to the greatest extent possible, to a permanent housing resource.
- Operating in compliance with The Final Rule for Equal Access in HUD Projects.
  - Family shelters must serve all family compositions.
  - Persons must be accepted into shelters in accordance with the gender with which they identify and present themselves.
- Making it known that use of the facilities and services are available to all on a nondiscriminatory basis.
- ES that serve families with children are prohibited from denying assistance to or separating members of a family with children based on gender or age.
- To the extent possible, ES should have 24/7 hours of operation.
- ES should operate with a low-barrier approach, to the maximum extent possible. This includes:
  - People do not have to line up for a bed each night or leave early in the morning
  - No drug and alcohol testing to get in
  - Not requiring identification documents to get in (and assist participants once they are in shelter to obtain these documents)
  - No criminal background checks to get in
  - Not requiring income to get in
  - Not requiring “housing-readiness” to get in
  - Accepting all family configurations if shelter provides services to families

- Accepting couples, if shelter provides services to singles
- Not requiring participation in services to remain in the shelter. Shelters should offer and encourage participation in services; however, shelters should not mandate services as a requisite for remaining in the shelter.
- There must be access to staff, whether paid or volunteer during hours of project operation. This may be on site or through cell phone, if necessary.
- Shelters should provide access to food preparation and food storage space.
- Shelters should make an effort to establish secure space for storage of personal possessions.
- To the maximum extent possible, shelters should provide secure storage of medications, especially in shelters with children.
- Smoking is prohibited in buildings that provide shelter to children.
- Weapons may not be brought into ES.
- Shelter guests may not bring or use illegal substances or alcohol on the premises.

### **Case Management**

Relevant case management standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Exit planning should start upon project entry with regular discussions about moving towards permanent housing.
- Shelter staff should conduct an initial service assessment within 7 days of intake, prioritizing emergency service needs and referral to CE; the access, assessment, and diversion phases of CE; then coordinating/providing services most crucial to housing attainment. Reassessments should be conducted weekly until discharge.

### **Performance Measures**

The CoC has established the following performance goals for ES:

- Households should move into permanent housing within an average of 35 days. (FY23 CoC System Performance Measures)
- At least 44% of households who exit ES exit to permanent housing. (FY23 CoC System Performance Measures)
- No more than 6% of households that exit to permanent housing after being homeless should become homeless again within 12 months. (FY23 CoC System Performance Measures)
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### **STREET OUTREACH (SO)**

SO includes provision of essential services necessary to reach out to people experiencing unsheltered homelessness; connect them with ES, housing, or critical services; and provide urgent, non-facility-based care to those who are unwilling or unable to access ES, housing, or an appropriate health facility. Coordinated SO that identifies and engages people living in unsheltered locations, such as in cars, parks, abandoned buildings, encampments, and on the streets, plays critical roles within systems for ending homelessness. Effective SO reaches people who might not otherwise seek assistance or come to the attention of the homelessness service system and ensures that people’s basic needs are met while supporting them along pathways toward housing stability.

### **Access**

Outreach workers are able to enroll households across the community, outside office walls, engaging with participants early and often. SO projects are required to provide the access, diversion, assessment, prioritization, and referral phases of CE, as described in the CE Policies and Procedures. SO projects are required to provide the Prevention phase of CE only to the extent necessary to determine that a participant is not experiencing literal homelessness and refer them to an appropriate service provider.

If SO projects are funded to provide the Prevention and Rapid Exit phases of CE, they must use a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one-time payments and short-term housing assistance, to identify the lightest-touch method to successfully re-establish each households into safe, stable permanent housing.

### **Eligibility**

The following categories of Individuals or families are eligible for SO services:

- Category 1: Literally Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1
- AND
- Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in ES

Note: It makes no difference if the individual experiencing homelessness is in a rural, suburban, or urban area. If the individual meets the above criteria, they are eligible, regardless of their location. Also, ES is not required as an interim step to access SO.

There are no additional criteria or guidelines that homeless households must meet to access these services.

### **Prioritization**

Anyone who is unsheltered is prioritized for SO, although everyone who meets eligibility should be able to be enrolled.

### **Documentation**

Relevant documentation standards include the information presented in the “Documentation for All Project Types” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Staff should be working with participants to obtain their necessary documentation, if applicable (i.e., Social Security cards, birth certificates, chronic status verification, etc.). These efforts would be documented in the case files along with any additional case notes.

### **Duration and Amounts**

There should be repeated attempts to assist, respecting participant choice.

ESG-funded SO Projects should conduct SO at a minimum of weekly, depending on budget and staffing.

No one is terminated from this project type unless: 1) They are placed in housing of their choice, 2) They indicate that they no longer need our services and request that their case be closed, or 3) They pose a serious threat of harm to the outreach staff or other participants.

## Minimum Standards

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards. Additional minimum standards for this project type include:

- SO efforts are housing focused; emphasize safety and reduce harm; and are systematic, coordinated, and comprehensive
- ESG-funded outreach staff/teams must participate in and/or lead the unsheltered PIT count in their community.

## Case Management

Relevant case management standards include the information presented in the “Case Management Standards for All Project Types” section of the CoC’s Written Standards. Additional case management standards for this project type include:

- Outreach staff should establish trust with the individuals or families identified through outreach focusing on building positive relationships, including creating a safe presence and initiating non-threatening conversation.
- Engagement activities should include an initial assessment of needs and eligibility in order to prioritize the type and source of assistance required, prioritizing safety and urgent health needs.
- Outreach staff should conduct an assessment to identify and prioritize those services for which individuals/families identified through outreach are eligible, including: case management; food sources; transportation; employment; early learning and education services; emergency health services; emergency mental health services; and essential services tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are living unsheltered.
- To the greatest extent possible, outreach staff completes the CE Assessment “out in the field”, enroll participants in the outreach Project for as long as needed (if that is the individual's choice), and hand off eligible households to longer term assistance Projects (such as permanent housing, RRH, or another appropriate permanent housing option).
- Outreach staff should link unsheltered individuals to a place to get warm, address/provide basic survival items and provide assistance with accessing benefits, services, and housing.
  - Services should include linking participants to mainstream benefits and resources, including behavioral health and intellectual disability services
- Services should be targeted to assisting households with attaining housing stability as quickly as possible.
- Participants should be linked to additional services by way of a warm hand off to the greatest extent possible.

## Performance Measures

The CoC has established the following performance goals for SO:

- At least 84% of households served under a SO Project will exit to housing of their choice (FY23 CoC System Performance Measures)..

For more information on suggested SO implementation ideas please refer to: **USICH Core Elements of Effective SO to People Experiencing Homelessness<sup>77</sup>**.

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<sup>77</sup> <https://www.usich.gov/guidance-reports-data/federal-guidance-resources/core-elements-effective-street-outreach-people>



### **SUPPORTIVE SERVICES ONLY (SSO)**

CoC-funded SSO projects (*not including SSO-CE projects for CE, which are addressed in the “CE” project section*), provide services to persons experiencing homelessness that are not tied to specific housing units. Those implementing this project type should help people relocate from unsheltered locations into somewhere safe as quickly as possible.

Note: CoC-Funded SO Projects funded under SSO and ESG-funded SO are covered in the “SO” section of the CoC’s Written Standards.

#### **Access**

Staff are able to enroll households outside the office walls, engaging with participants early and often. SSO projects are required to provide the access, diversion, assessment, prioritization, and referral phases of CE, as described in the CE Policies and Procedures.

SSO projects that are funded to provide Prevention services, including assessment, triage, and/or HPS Prevention services, must provide the Prevention phase of CE. SSO projects that are funded to provide longer-term case management must provide the Rapid Exit phase of CE. If SSO projects are funded to provide the Prevention and Rapid Exit phases of CE, they must use a progressive engagement approach that incorporates Housing Problem Solving (HPS) Prevention techniques to serve households with case management, supportive services, and financial assistance, including one-time payments and short-term housing assistance, to identify the lightest-touch method to successfully re-establish each households into safe, stable permanent housing.

#### **Eligibility**

The following categories of individuals or families are eligible for SSO projects:

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 4: Fleeing/Attempting to Flee Domestic Violence

#### **Prioritization**

Those who are unsheltered are to have an expedited enrollment to the greatest extent possible over anyone who is sheltered.

#### **Documentation**

Relevant documentation standards include the information presented in the “Documentation for All Project Types” section of the CoC’s Written Standards. Additional documentation standards for this project type include:

- Working with participants to obtain their necessary documentation, if applicable (i.e., Social Security cards, birth certificates, chronic status verification, etc.). These efforts would be documented in the case files along with any additional case notes.

#### **Duration and Amounts**

No one is terminated from this project type until: 1) They are placed in housing of their choice, 2) They indicate that they no longer need services and request that their case be closed, or 3) They pose a serious threat of harm to the outreach staff or other participants.

There should be repeated attempts to engage and assist households, while respecting participant choice.

### **Minimum Standards**

Relevant minimum standards include the information presented in the “Minimum Standards for All Project Types” section of the CoC’s Written Standards.

### **Case Management**

Relevant case management standards include the information presented in the “Minimum Standards for All Project Types” and “SO” sections of the CoC’s Written Standards. Additional case management standards for this project type include:

- Supportive services must focus on assisting participants in obtaining housing and engage participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement back into permanent housing.
- Services should include linking participants to mainstream benefits and resources, including behavioral health and intellectual disability services.
- Case management services should be targeted to assisting households with attaining housing stability as quickly as possible.
- Participants should be linked to additional services by way of a warm hand off to the greatest extent possible.

### **Performance Measures**

The CoC has established the following performance goals for SO:

- Households served in SSO Projects should move into permanent housing within an average of 30 days or less. (2024 CoC Renewal Scoring Criteria)

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### **COORDINATED ENTRY (SSO-CE)**

SSO-CE projects, which include CE Assessment Centers and CE staff, shall be governed by (1) the established expectations and standards outlined in the MOU between the CoC Governing Board and the SSO-CE grantee/ CE Lead Agency, (2) the CoC’s Coordinated Entry Policies and Procedures, and (3) other applicable CE governing documents as they are adopted.

Please see CE Policies and Procedures: <https://pennsylvaniacoc.org/resources/western-pa-coc-coordinated-entry-20>

# Appendices

**APPENDIX A: HUD REQUIREMENTS FOR WRITTEN STANDARDS**

## HUD's Requirements for Written Standards

Both the CoC and ESG Interim Rules identify specific requirements for Written Standards for programs that utilize these funds. The following are required to be included in the CoC's Written Standards:

### Continuum of Care (CoC) Funded Projects – Required Written Standards

The following are the requirements for Written Standards for Continuum of Care (CoC) Funded Projects per 24 CFR Part 578: The Homeless Emergency Assistance and Rapid Transition Interim Rule.

578.7(a)(9) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

- (i) Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
- (ii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- (iii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
- (iv) Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
- (v) Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance;

### Emergency Solution Grant (ESG) Funded Projects – Required Written Standards

The following are the requirements for Written Standards for Emergency Solution Grant (ESG) Funded Projects per 24 CFR Part 576(3): Emergency Solutions Grants Program Interim Rule:

#### Applicable to ALL ESG program types:

- (i) Standard policies and procedures for evaluation of individuals' and families' eligibility under ESG
- (v) Coordination with the below referenced programs and resources is required of all ESG funded programs:
  - Coordination with other targeted homeless services: Per 24CFR576.400(b) ESG funded programs are required to coordinate with other programs targeted to people experiencing homelessness in the area covered by the CoC to provide a strategic, community-wide system to prevent and end homelessness for the CoC. A list of these programs is provided in **Appendix A**.
  - System and program coordination with mainstream resources: Per 24 CFR576.400(c) ESG funded programs are required to coordinate to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for households experiencing homelessness or at risk of homelessness. Examples of these programs are provided in **Appendix A**.

**Applicable to HOMELESSNESS PREVENTION AND RAPID REHOUSING:**

(vi) Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

(vii) Policies and procedures for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid-re-housing assistance.

(viii) Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

(ix) 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 re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.

**Applicable to EMERGENCY SHELTERS:**

(iii) Policies and procedures for admission, diversion, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.

(iv) Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter

**Applicable to STREET OUTREACH:**

(II) Standards for targeting and providing essential services to street outreach

**APPENDIX B: INCLUSION AND NON-DISCRIMINATION POLICIES**

## INCLUSION AND NON-DISCRIMINATION POLICIES FOR THE WESTERN PA CONTINUUM OF CARE

### BACKGROUND

The Western PA Continuum of Care (CoC) works to foster a sense of collaboration and shared purpose among its participating members around the work to end homelessness throughout its 20-county region. As such, the CoC is committed to providing a person-centered, culturally aware service-delivery system in which all individuals, including people of color, LGBTQI persons, persons with disabilities, immigrant populations, and other historically marginalized populations, receive the assistance needed to end their homelessness. To this end, the CoC's Governing Board has: established a Diversity, Equity, Inclusion & Belonging (DEIB) Committee; participates in regular DEIB training; provides DEI-focused CoC training; and all Board members have signed the CoC's Truth and Values statement<sup>1</sup>. To further this work, the Governing Board is introducing the below non-discrimination and inclusion policies for CoC-wide implementation.

In addition to adhering to this policy, all homeless assistance providers must manage projects in accordance with federal and local nondiscrimination and equal opportunity provisions, as codified in the [Fair Housing Act](#), Section 504 of the [Rehabilitation Act](#), Title VI of the [Civil Rights Act](#), Titles II & III of the [Americans with Disabilities Act](#), HUD's [Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity](#) (2012 Equal Access Rule), HUD's [Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs](#), and the Western PA CoC policy. Additionally, many local municipalities have relevant anti-discrimination ordinances by which to abide.

### NON-DISCRIMINATION & INCLUSIONARY POLICIES

The Western PA CoC's Non-discrimination and Inclusion Policies promote programming that provide the highest quality of services, without bias, and are delivered in an equitable, trauma-informed manner.

**NON-DISCRIMINATION:** Each provider must have a zero-tolerance policy prohibiting *intentional* discrimination regarding staff, clients, and the public based on actual or perceived disability, race, ethnicity, color, national origin, ancestry, religion, age, sex, sexual orientation, gender identity and expression, marital status, familial status, source of income, or domestic or sexual violence victim status, ensuring that all participants are afforded equal opportunities (See **Appendix A** for *Definitions of Prohibited Discrimination*). In instances where the discrimination was an *unintentional* first offense, the CoC supports using the isolated instance as a teachable moment, both for personal and organizational growth.

**INCLUSION:** Providers must not only have a policy against discrimination, but they must also take positive, concrete steps toward inclusion. To this end, providers must have

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<sup>1</sup> Truth and Values Statement is provided as Appendix C



inclusionary policies related to general programming, housing and facilities (as applicable), and language (paperwork, names, and pronouns). The CoC recognizes that individuals have the right to be called by their chosen name and referred to by the gender pronoun that they designate and that matches their gender identity as they know themselves to be.

**EQUAL ACCESS:** Programs must affirmatively provide equal access to their housing and supportive services in a nondiscriminatory manner that ensures that all persons are afforded equal opportunities. The CoC acknowledges that additional services/support may be needed in order to provide equal access to housing opportunities. For example, some populations may need additional assistance locating housing and executing a lease.

## APPLICABILITY

These policies promote the safety, dignity, and well-being of all individuals and families accessing and utilizing programs associated with the Western PA CoC. All recipients of Emergency Solutions Grant (ESG), Continuum of Care, Home4Good, or any other program which either requires the CoC as its applicant or seeks the support of the CoC, shall operate in accordance with these policies in addition to following all applicable law.

## THE COC'S COMMITMENTS TO PROMOTE INCLUSION AND ADDRESS DISCRIMINATION

**INCLUSIVE ENVIRONMENT:** To create and foster an inclusive environment in venues in which CoC members join together to advance our collective work. As such, the Western PA CoC will not tolerate the use of hate speech, hate language or hate symbols by CoC members in the course of participating in or conducting work on behalf of or related to the CoC. Should a CoC member experience any form of discrimination, intolerance, physical harassment, sexual harassment, and/or verbal harassment while participating in CoC-related trainings, meetings and/or events, they should feel empowered to immediately report such a violation to the appropriate party (i.e., Executive Committee member present, Committee Chair, DCED, CoC Consultant, training facilitator, etc.), recognizing that the appropriate party may vary depending on the context of the violation and the setting. The violation will be brought to the attention of the CoC's Executive Committee which will respond accordingly on a case-by-case basis.

**TRAINING:** To provide access to trainings so that as a CoC we can:

- Better understand, identify, challenge and control our own implicit bias
- Build cultural awareness to improve our service delivery and to avoid barriers to communication
- Develop a shared language (see **Appendix B**)

**DATA:** To collect, evaluate, and report system and program performance data using an equity lens:

- Utilize data to identify disparities and increase awareness
- Provide data to the Board and applicable Committees for disparities to be addressed
- Reevaluate data to monitor impact of strategies implemented to promote equity

**RESOURCES:** Align the necessary resources to continue our work towards a more just and equitable homeless service system. This will include adjustments within the system to address

data findings that point to disparities within the CoC's service delivery. This may include changes to the coordinated entry process, prioritization of resources, service delivery and other elements of the CoC system.

**REPRESENTATION:** Develop authentic partnerships with community members who have experienced homelessness, as they are best informed to create and/or inform service delivery and program design. In an effort to intentionally diversify the CoC's leadership, those with lived experience, people of color and other marginalized groups will be encouraged to hold seats on the Governing Board, with voting rights and decision-making power, as well as participate in and/or lead CoC Committees.

Moreover, each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided with CoC funding.<sup>2</sup>

**TEMPLATES:** Provide program-level policy and paperwork language around inclusionary and nondiscriminatory practices.

**PERFORMANCE MEASURES:** Additional measures will be added to the renewal project scoring criteria, linking permanent housing placement to equitable service delivery.

This policy is effective as of September 30, 2022 and was approved by the Western PA CoC Board on September 27, 2022.

CoC grantees are required to adopt an organizational or project-level Non-Discrimination Policy by the time they submit their FY2023 renewal application to the Western PA CoC.

ESG grantees are required to adopt an organizational or project-level Non-Discrimination Policy by the time they execute their FY2023 ESG contract with the Pennsylvania Department of Community and Economic Development (DCED).

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<sup>2</sup> This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

## APPENDIX A - DEFINITIONS OF PROHIBITED DISCRIMINATION<sup>ii</sup>

**AGE DISCRIMINATION** refers to situations in which how old an individual is determines whether or not the person has access to certain terms, conditions or services.

**ANCESTRY** refers to the nation, country, tribe or other identifiable group of people from which a person descends. It also can refer to the physical, cultural or linguistic characteristics of the person's ancestors. Ancestry discrimination may often overlap with, but is not always synonymous with, national origin discrimination.

**COLOR DISCRIMINATION** refers to discrimination based on shade or hue of skin, such as Light-skinned or Dark-skinned. A variety of hues exist in every ethnic and racial group; therefore, color discrimination is not always synonymous with race discrimination and can even occur within a single racial group.

**DISABILITY** refers to a physical or mental impairment that substantially limits an individual's ability to perform a major life activity. The protections against disability discrimination cover (1) individuals who currently have a physical or mental impairment that substantially limits one or more major life activities; (2) persons who previously had a physical or mental impairment that substantially limits one or more major life activities; and (3) persons who are believed to have a physical or mental impairment that substantially limits one or more major life activities, regardless of whether that belief is correct. The protection against disability discrimination includes a duty to provide reasonable accommodations that would allow an individual with a physical or mental disability to access and obtain full enjoyment of employment, public accommodations or housing and real property.

**DOMESTIC OR SEXUAL VIOLENCE** refers to any act of domestic violence, sexual assault or stalking as defined in sections of the Pennsylvania Code related to rape, incest, sexual abuse of children, unlawful contact with a minor, sexual exploitation of children, statutory sexual assault, involuntary deviate sexual intercourse, sexual assault, aggravated indecent assault or indecent assault.

**ETHNICITY** refers to membership in a particular cultural group. It is defined by shared cultural practices, including but not limited to holidays, food, language, and customs. Ethnicity may often overlap with ancestry, and like ancestry discrimination, ethnic discrimination may often overlap with, but is not always synonymous with, national origin discrimination.

**FAMILY** includes, regardless of actual or perceived sexual orientation, gender identity, or marital status: (1) A single person or (2) A group of persons residing together. Federal and local laws prohibit discrimination based on familial status (i.e., one cannot discriminate against households consisting of one or more individuals under 21 years of age and (1) a parent or other person having legal custody of the minor(s) or (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person). The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years.

Projects funded under the CoC Program may limit housing to families with children, according to 24 CFR 578.93(b)(3). The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives CoC funds (24CFR 578.93(e)).

**GENDER EXPRESSION** A person's expression of their gender identity (i.e., appearance, dress, mannerisms, speech, social interactions.).<sup>iii</sup>

**GENDER IDENTITY** is a person's inner sense of being male, female, both or neither, regardless of the sex assigned to that person at birth, based on visual biological markers<sup>iv</sup>, and regardless of the person's perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents. Programs must not ask participants to provide anatomical information or documentary (ID), physical, or medical evidence of gender identity.

**MARITAL STATUS** refers to the state of being one of the following: Single, Married, Separated, Divorced, Widowed, Life Partner. Marital status discrimination includes discrimination based on assumed characteristics of people in particular marital status groups.

**NATIONAL ORIGIN** refers to "the country where a person was born, or, more broadly, the country from which their ancestors came." National origin discrimination includes discrimination based on place of origin or on the physical, cultural, or linguistic characteristics of a national origin group. National origin discrimination includes discrimination on the basis of accent, manner of speaking, or language fluency.

**RACE DISCRIMINATION** includes discrimination on the basis of physical characteristics associated with a particular race, such as hair texture, facial features and hair color. Individuals of Hispanic or Latino ethnicity, or any ethnicity, may belong to one or more racial group. Race may be related to color but is not synonymous with color. Race is associated with the following groups:

- American Indian/Alaska Native: A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment
- Asian: Persons having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam
- Black/African American: A person having origins in any of the Black racial groups of Africa
- Native Hawaiian/Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands
- White: A person having origins in any of the original peoples of Europe and the Middle East
- Bi-racial or Multi-racial: All persons who identify with more than one of the five above races

**RELIGIOUS DISCRIMINATION** refers to discrimination based on an individual's religious observances, practices or beliefs. It also includes discrimination based on moral or ethical beliefs as to what is right and wrong that are sincerely held with the strength of traditional religious views, regardless of how widespread the particular beliefs or practices are. Religious discrimination may manifest itself as a preference for or against members of a particular religious group. It may also be evidenced as intolerance for observation of religious laws regarding dress, dietary habits, and work schedules.

**SEX** encompasses both the biological differences between men and women and the cultural and social aspects associated with masculinity and femininity (i.e., gender). Sex assigned at birth is a label usually based on visible genital anatomy, or perhaps on biological information such as DNA or chromosomes.<sup>v</sup> Sex discrimination refers to discrimination based on one of the following categories: male/female; pregnancy, childbirth or related medical conditions; sex stereotyping; or change in sex. Sex-specific programs are acceptable only limiting access on the basis of sex is only acceptable in programs for pregnancy, childbirth or related medical conditions. In these types of programs, it is acceptable to limit participation to individuals who were assigned female sex at birth.

**SEXUAL ORIENTATION** A person's attraction to others based on their gender. Being Gay, Lesbian, Bisexual, or Straight are examples of one's sexual orientation.<sup>vi</sup> Sexual orientation discrimination includes discrimination based on perception of an individual's sexual orientation, whether that perception is correct or not.

**SOURCE OF INCOME** refers to any lawful income, subsidy or benefit with which an individual supports themselves and their dependents, including, but not limited to, child support, maintenance, and any federal, state or local public assistance, medical assistance, or rental assistance program.

## APPENDIX B - GLOSSARY FOR A SHARED LANGUAGE ACROSS THE COC

**ASEXUAL** Indicates people who do not feel sexual attraction. Some people say Ace. <sup>vii</sup>

**BIAS** Occurs when rather than being neutral, we have a preference for (or aversion to) a person or group of people. <sup>viii</sup>

**CISGENDER** A term used to describe people who are not transgender and are comfortable with the gender they were assigned at birth. <sup>ix</sup>

**CULTURAL DIVERSITY** Differences in orientation to the world based on the traditions, customs and collective consciousness of the cultural group of which the person is a member. <sup>x</sup>

**DIVERSITY** Differences due to demographic composition <sup>xi</sup>

**EQUALITY** Everyone gets the same thing. It is a one-size fits all approach. <sup>xii</sup>

**EQUITY** The fair treatment, access, opportunity, and advancement for all people, while at the same time striving to identify and eliminate barriers that have prevented the full participation of some groups.<sup>xiii</sup> Equity means everyone gets what they need. It results in better outcomes for everyone.<sup>xiv</sup>

**GENDER ASSIGNED AT BIRTH** The pronouncement of “male” or “female” gender at birth based on visual biological markers. <sup>xv</sup>

**GENDER EXPRESSION** A person’s expression of their gender identity (i.e., appearance, dress, mannerisms, speech, social interactions.).<sup>xvi</sup>

**GENDER IDENTITY** is a person’s inner sense of being male, female, both or neither, regardless of the sex assigned to that person at birth, based on visual biological markers<sup>xvii</sup>, and regardless of the person’s perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person’s appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents. Programs must not ask participants to provide anatomical information or documentary (ID), physical, or medical evidence of gender identity. <sup>xviii</sup>

**GENDER NON-CONFORMING** A term used to describe some people whose gender expression is different from conventional expectations of masculinity and femininity. Not all gender nonconforming people identify as transgender; nor are all transgender people gender nonconforming. <sup>xix</sup>

**IMPLICIT BIAS** Thoughts and feelings are “implicit” if we are unaware of them or mistaken about their nature. This term is used to describe when we have attitudes towards people or associate stereotypes with them without our conscious knowledge. <sup>xx</sup>

**INCLUSION** Involves both being fully ourselves and allowing others to be fully themselves in the context of engaging in common pursuits. It means collaborating in a way which all parties can be fully engaged and subsumed, and yet, paradoxically, at the same time believe that they have not compromised, hidden, or given up any part of themselves. <sup>xxi</sup>

**INTERSECTIONALITY** simply denotes the interconnected nature of social categorizations such as race, class, and gender as they apply to a given individual or group. <sup>xxii</sup>

**INTERSEX** People who possess both male and female biological attributes to a varying degree. They may include sexual organs, DNA, chromosomes, hormones, or a combination. Intersex is always biological. <sup>xxiii</sup>

**NON-BINARY AND/OR GENDERQUEER** Terms used by some people who experience their gender identity and/or gender expression as falling outside the categories of man and woman. They may define their gender as falling somewhere in between man and woman, or they may define it as wholly different from these terms. Not a synonym for transgender and should only be used if someone self-identifies as non-binary and/or genderqueer. <sup>xxiv</sup>

**QUEER** Is considered by many as an all-inclusive and mainstream term to denote the extended LGBTQ+ community. However, some LGBT people find it offensive or that it denies individual identifies. Note that it is unacceptable to use the word Queer in a negative way that demeans the LGBTQ community and it is best not to use the word Queer in any conversation with an LGBTQ person unless they use it in an inclusive positive way, first. <sup>xxv</sup>

**RACE** Refers to physical differences that groups and cultures consider socially significant. <sup>xxvi</sup>

**RACIAL EQUITY** The condition that would be achieved if one's racial identity no longer predicted, in a statistical sense, how one fares. When we use the term, we are thinking about racial equity as one part of racial justice, and thus we also include work to address root causes of inequities, not just their manifestation. This includes elimination of policies, practices, attitudes, and cultural messages that reinforce differential outcomes by race or fail to eliminate them. <sup>xxvii</sup>

**RACISM** The belief that a particular race is superior or inferior to another. <sup>xxviii</sup>

**SEX ASSIGNED AT BIRTH** This label is usually based on visible genital anatomy, or perhaps on biological information such as DNA or chromosomes. <sup>xxix</sup>

**SEXUAL ORIENTATION** A person's attraction to others based on their gender. Being Gay, Lesbian, Bisexual, or Straight are examples of one's sexual orientation. <sup>xxx</sup> Sexual orientation discrimination includes discrimination based on perception of an individual's sexual orientation, whether that perception is correct or not. <sup>xxxi</sup>

**SOGI** Acronym standing for Sexual Orientation and Gender Identity <sup>xxxii</sup>

**TRANSGENDER** Broad term describing people whose gender expression is non-conforming and/or whose gender identity is different from their gender assigned at birth. It applies to all gender-variant people, including those who choose to identify with neither or both of the two (binary) sexes. This is an adjective that describes a state of being. <sup>xxxiii</sup>

**TRANSITIONING (GENDER TRANSITION)** The process of changing one's gender expression from one's birth assigned gender to one's gender identity. <sup>xxxiv</sup> A complex process that occurs over a long period of time and can include various personal, medical, and legal steps. Transitioning does not require medical treatment. Avoid the phrase "sex change."

**SYSTEMIC RACISM** Racism applied to our social and/or political institutions (rather than "just" interpersonal). <sup>xxxv</sup>

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- I CFR § 578.75 General operations
- ii Adapted from Philadelphia CoC's Non-discrimination Policy, unless where otherwise noted.
- lii Bradbury-Sullivan LGBT Community Center Training Institute
- lv Bradbury-Sullivan LGBT Community Center Training Institute
- v Bradbury-Sullivan LGBT Community Center Training Institute
- vi Bradbury-Sullivan LGBT Community Center Training Institute
- vii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- viii Perception Institute
- ix Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- x Ferdman, 2010
- xi Ferdman, 2010
- xii ICW Consulting Group, 2020
- xiii Independent Sector, Why Diversity, Equity and Inclusion Matter
- xiv ICW Consulting Group, 2020
- xv Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xvi Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xvii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xviii Philadelphia CoC's Non-discrimination Policy
- xix Philadelphia CoC's Non-discrimination Policy
- xx Perception Institute
- xxi Ferdman, 2010
- xxii Merriam-Webster
- xxiii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxiv Philadelphia CoC's Non-discrimination Policy
- xxv Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxvi American Sociological Association
- xxvii Center for Assessment and Policy Development, <http://www.capd.org>
- xxviii American Defamation League
- xxix Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxx Bradbury-Sullivan LGBT Community Center Training Institute, 2020 <sup>xxxi</sup>  
Philadelphia CoC's Non-discrimination Policy
- xxxii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxxiii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxxiv Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxxv ICW Consulting Group, 2020



## APPENDIX C – WESTERN PA COC DEI VALUES AND TRUTH STATEMENTS

### Values Statements (We will . . .)

1. Create and support an inclusive and affirming environment and culture
2. Use respectful language that validates individuals' lived experience
  - \* Do ask folks how they identify in terms of disability (e.g. person first or identity first language; race; ethnicity; age; and sexual identity, expression and orientation)
  - \* Do ask which pronouns people use; don't assume or guess
  - \* Do say, "people experiencing homelessness"; don't say, "homeless people or youth"
  - \* Don't say that people experiencing homelessness are "lazy," "homeless by choice"
3. Understand that the Western PA CoC is not a "charity"
  - \* We are here to serve, not to save
  - \* Recognize and respect the experience, expertise and insights of our clients and our colleagues
4. Understand that all people could have trauma that we're not aware of
  - \* Recognize that the experience of homelessness is often a traumatic experience, regardless of quality of/extent of resources
  - \* Part of our work is to be responsive to the diverse circumstances that might contribute to experiences of homelessness
  - \* Understand that for some, the experience of homelessness or home insecurity might be normalized and respond accordingly

### Truth Statements (We believe...)

1. Everyone deserves a home
2. Homelessness is often a consequence of systems of oppression and require an ongoing and sustained commitment to understanding how structural and intersectional oppression and structural privilege contribute to and sustain experiences of homelessness
3. We are an open, inclusive organization that seeks to build and support diversity and belonging

Board member signature: \_\_\_\_\_

Board member printed name: \_\_\_\_\_

Date: \_\_\_\_\_

# ORGANIZATIONAL AND PROGRAMATIC POLICY LANGUAGE AND RESOURCES TO PROMOTE NON-DISCRIMINATION & INCLUSION THROUGHOUT THE WESTERN PA COC

## INTRODUCTION

This packet contains sample policy language, encouraged practices and tools that can help set a standard of inclusion and safety for all families and individuals who might access services or resources at a given organization throughout the Western PA CoC.

There are two layers of policy which must be considered: one for your organization, its employees, etc.; and another to guide interactions between the organization/program and the client. The majority of the policy samples herein are focused on promoting positive interactions with the CoC's end-user, the person who is either experiencing homelessness or who is about to become homeless. That said, the first set of sample policy language and resources can be used by the organization to foster its own internal interactions and culture; and much of the program/client-level language cited in the second set of sample policy language can also be adapted to guide internal organizational policy since the principles are similar for both policy types.

The sample language herein begins where the CoC's Non-Discrimination and Inclusion Policies leave off, providing a greater level of detail and nuance. ***Once any policy(ies) is/are drafted, they should be signed by all employees and the organization's executive director, affirming their commitment to equal opportunity, non-discrimination and inclusion.***

Practical organizational next steps, encouraged programmatic practices as well as wording templates are also included.

## FOR INTERNAL ORGANIZATIONAL USE

### NON-DISCRIMINATION & INCLUSION LANGUAGE

A positive practice is developing organization-wide Equity and Values Statements which promote inclusion and nondiscrimination. To this end, a sample of each is provided which can be used in their entirety, or some portions thereof, so as to create new or enhance existing statements that organizations may abide by.

**SAMPLE EQUITY STATEMENT:** “ \_\_\_\_\_ is committed to fostering, cultivating and preserving a culture of diversity and inclusion.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and organization’s achievement as well.

We embrace and encourage our employees’ differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

\_\_\_\_\_ diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees’ varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees of \_\_\_\_\_ have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor or an HR representative." <sup>i 1</sup>

**SAMPLE VALUES STATEMENT:** "Fundamentally, \_\_\_\_\_'s work to advance racial justice is embedded in the following core values:

- People of Color: We value the voices, experiences, cultures, intellect and multidimensionality of people of color.
- Justice: We value fairness, the best foundation for unity among all people.
- Transformation: We value the ability of individuals and systems to change in ways that make racial justice possible. We recognize the importance of struggle in fueling transformation.
- Bridging: We value the insights, relationships and holistic understandings that are deepened when divergent paths come together.
- Expression: We value voicing and sharing our viewpoints with integrity even when difficult, unpopular or risky.
- Adaptability: We value relevance and resourcefulness in the face of changing social, economic, political and ideological environments.
- Delight: We value making space for laughter, beauty, and joy in the work of social change." <sup>ii</sup>

## PRACTICAL ORGANIZATIONAL NEXT STEPS

The following examples are tangible ways in which your organization can take action to promote equity and nondiscrimination from within the organization itself.

- Regularly promote racial and other equities throughout communication platforms. <sup>iii</sup>
- Maintain a topic-area webpage on racial equity in homelessness and housing that includes up-to-date research and information for funders and the general public. <sup>iv</sup>
- Add non-discrimination and inclusive language to all contracts and MOUs, holding all parties to the same standards.
- Hire minority contractors when there are opportunities to do so. <sup>v</sup>
- Commit to diversity of speakers in all in-person and virtual presentations, panels, public talks, and other programs. <sup>vi</sup>
- Intentionally consider and select members from underrepresented and priority populations for the board of directors and staff (African-American, Native American, Latin(x), and the LGBTQI community). <sup>vii</sup> The diverse board of directors should reflect

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<sup>1</sup> Should you choose to use this statement, or a portion thereof, the statement must be cited as it is in the footnotes.

the community it serves. It should be ensured that minorities are not just employed in direct-service positions, but also hold leadership/decision-making positions. <sup>viii</sup>

- Select staff and members for board service whose values include racial equity and social justice. <sup>ix</sup>
- Provide regular learning and training for board and staff to build capacity around racial and other inequities; including explicit training on structural and historic racism and its impact on systems and policies. <sup>x</sup>
- Ensure that all programs and policy priorities are developed using a racial equity lens. <sup>xi</sup>
- Use an intersectional lens and analysis to understand how experiences of systemic racism and homelessness are also shaped by gender and gender identity, socio-economic status, sexual orientation, and other factors, so that our analysis and strategies respond to the diverse experiences of people served. <sup>xii</sup>
- Ensure that policies in governance and organizational administration are conducted using a racial equity lens. <sup>xiii</sup>
- When looking at policy/lies, mission and/or vision statements, make sure they include language affirming your commitment to inclusion, not just non-discrimination language. <sup>xiv</sup>
- Adopt a shared language, such as what was provided in Appendix B of the Non-Discrimination and Inclusion Policies.
- Include a Race Equity Impact Assessment in your internal evaluations. These questions can help you begin your race equity impact assessment:
  1. Are all racial and ethnic groups that are affected by the policy, practice or decision at the table?
  2. How will the proposed policy, practice or decision affect each group?
  3. How will the proposed policy, practice or decision be perceived by each group?
  4. Does the policy, practice or decision worsen or ignore existing disparities?
  5. Based on the above responses, what revisions are needed in the policy, practice or decision under discussion? <sup>xv</sup>
- Allocate prevention funding based on a *Selected Group Strategy* <sup>xvi</sup>.  
GOAL: Keep marginalized populations housed targeting assistance to those who likely face significant structural barriers that make loss of housing more likely. If correctly designed, adequately resourced, and informed by people most impacted, these strategies will reduce racial disparities in who experiences homelessness (sample budget available in footnoted hyperlink)

**TARGET POPULATION:** Groups or populations with a particularly high risk of homelessness as members of a protected class.

KEY PARTNERSHIPS: People with lived experience, Civil Legal Aid/Eviction Courts, Advocacy organizations and Non-profits primarily led by people of color and primarily serving the selected target population(s)

Not sure how your organization measures up in terms of promoting equitable practices? Check out CommunityWise Resource Centre's publication: [Anti-Racist Organizational Change: Resources & Tools for Nonprofits](#). Pages 35-43 will be especially helpful in terms of performing an organizational self-assessment; examining existing policies, hiring practices, and mission statements; as well as learning from their processes, step-by-step, with some real tangible and practical advice in creating a more inclusive organizational culture.

## FOR PROGRAMMATIC/ CLIENT-LEVEL USE

### SAMPLE POLICY LANGUAGE

Many of the policy samples below have already been adapted for more general use due to the CoC's broad service delivery base, however individual programs can certainly tailor the language to be more specific to better suit their needs (i.e., to specify youth, etc.). To formulate your policies, begin with relevant language from the CoC's Non-Discrimination and Inclusion Policies and add as much specificity as you need to with the suggestions provided.

#### REGARDING NON-DISCRIMINATION & INCLUSION

**SAMPLE:** "Recognizing that prejudice, discrimination and stereotyping are prevalent throughout society and dedicated to the creation of a safe, secure space for those seeking services with us, it shall be the policy of \_\_\_\_\_ to maintain and promote a facility that provides the highest quality of services to youth regardless of their actual or perceived sexual orientation and/or gender identity. Individuals receiving services at \_\_\_\_\_ shall receive fair and equal treatment, without bias, and shall be treated in a professional manner." <sup>xvii</sup>

**SAMPLE:** "Employees, volunteers and other individuals involved in providing services shall immediately report any evidence of discrimination, physical or sexual harassment, and verbal harassment to their supervisor." <sup>xviii</sup>

**SAMPLE:** "\_\_\_\_\_ is committed to providing all individuals and families served by \_\_\_\_\_ and our contracted provider agencies a safe, healthy, inclusive, affirming and discrimination-free environment." <sup>xix</sup>

**SAMPLE:** "We serve many types of individuals/women/youth here: individuals/women/youth of different races, religions, sexual orientations, gender expressions, and gender identities." <sup>xx</sup>

**SAMPLE:** "\_\_\_\_\_ empowers people to live healthy and successful lives. \_\_\_\_\_ celebrates our diversity and advocates for justice and opportunity." <sup>xxi</sup>

#### REGARDING GENERAL PROGRAMMING

**SAMPLE:** "\_\_\_\_\_ will take all reasonable steps within its control to meet the diverse needs of the individuals we serve and provide an environment in which clients are treated with respect and dignity, regardless of sexual orientation, gender identity or expression, or other protected categories." <sup>xxii</sup>

**SAMPLE:** "Under no circumstances is any staff member of \_\_\_\_\_ or its provider agencies to attempt to convince a transgender or gender nonconforming individual to reject or modify their gender identity or gender expression." <sup>xxiii</sup>

**SAMPLE:** "Staff must be able to recognize the signs of distress, support disclosure when appropriate, and follow appropriate protocols for reporting." <sup>xxiv</sup>

**SAMPLE:** “Staff must set a good example and make clients aware that any threats of violence, disrespectful and/or suggestive comments, or gestures toward any individual will not be tolerated. Staff also shall not engage in these behaviors.” <sup>xxv</sup>

## **REGARDING HOUSING AND FACILITIES**

**SAMPLE:** “Individuals shall not automatically be housed according to their birth sex. Decisions shall be made based on individualized needs and should prioritize emotional and physical safety taking into account the individual’s perception of where they will be most secure, as well as any recommendations from the individual’s health care provider. It is most appropriate to house individuals based on their gender identity. If necessary to ensure their privacy and safety, individuals shall be provided a single room, if available.” <sup>xxvi</sup>

**SAMPLE:** “Decisions on housing for a transgender individual must be based on the transgender individual’s needs and must prioritize their emotional and physical safety. It is critical to include the transgender individual in the decision-making process.” <sup>xxvii</sup>

**SAMPLE:** “All individuals receiving services and placement have a right to safety and privacy. In instances when safety or privacy concerns are brought forth, programs and organizations must demonstrate non-discriminatory applied response. Fair and open use of a program and facilities space and features is a right of all. Any client’s discomfort with transgender and /or gender non-conforming identity is not cause for limiting the transgender or gender non- conforming person’s enjoyment and use of the facility and its features, either physically or programmatically.” <sup>xxviii</sup>

**SAMPLE:** “All individuals seeking services have the right to placement and services that align with their gender identity. This right is never contingent upon having received any medical treatment to physically change the body. Likewise, those who do not identify as male or female have a right to placement and services that best supports their own personal safety. No person’s placement or acceptance for service in a sex-segregated facility can be refused based upon a determination that their appearance or behavior does not conform to gender stereotypes. Facilities that legally separate participants by sex must serve all who identify with that gender, without requiring documentation.” <sup>xxix</sup>

**SAMPLE:** “All families, regardless of composition or gender identities within the family, have the right to placement and services in accordance with their needs, including placement in congregate facilities. Perceived non-congruence of gender identity or expression of any family member does not constitute an acceptable reason for refusal of services/placement.” <sup>xxx</sup>

**SAMPLE:** “Facility restrooms/bathrooms/showers and personal care areas must be open for use consistent with gender identity by all program participants. No barriers to the use and availability of restrooms/ bathrooms/showers and personal care areas can be imposed due to appearance or bodily/ physical/biological characteristics. No participant can be required to produce legal documentation of gender identity to determine appropriate use of facilities. It is a violation of the Equal Access Rule to institute specific provisions such as schedules by which transgender program participants can use bathrooms/showers and personal care areas separate from cisgender program participant.” <sup>xxxi</sup>



## REGARDING LANGUAGE: Paperwork, Names, Pronouns

**SAMPLE:** “Employees, volunteers, and contractors, when working with clients at \_\_\_\_\_ shall use respectful language and terminology that does not further stereotypes. <sup>xxxii</sup>

**SAMPLE:** “Employees, volunteers, and contractors of \_\_\_\_\_, in the course of their work, shall not refer to any individual by using derogatory language in a manner that conveys bias towards or hatred of LGBT people. In particular, employees of \_\_\_\_\_ shall not imply to or tell LGBT individuals that they are abnormal, deviant, or sinful, or that they can or should change their sexual orientation or gender identity. <sup>xxxiii</sup>

**SAMPLE:** “Employees shall not disclose an individual’s sexual orientation or gender identity to other individuals or agencies, such as healthcare or social service providers or family and friends, without the individual’s permission, unless such disclosure is necessary to comply with state or federal law. <sup>xxxiv</sup>

**SAMPLE:** “All staff must clarify with clients which name and pronouns should be used in which settings—including in conversations with the young person’s family, other providers, etc. <sup>xxxv</sup>

**SAMPLE:** “Personnel should be aware of cultural and generational differences in language related to SOGIE, and should defer to the individual about the language they use to describe their identity, regardless of the name on the individual’s identity documents. <sup>xxxvi</sup>

**SAMPLE:** With respect to gender questions in Homeless Management Information System (HMIS) collection system, program participants must be given all gender response choices and have their selection recorded accordingly. <sup>xxxvii</sup>

## ENCOURAGED PROGRAMMATIC PRACTICES

The following examples are tangible ways in which your organization can take action to promote equity and nondiscrimination at the programmatic level.

- Personnel are prohibited from using language that demeans, ridicules or condemns LGBT individuals. Personnel should also avoid words that convey common misconceptions about sexual orientation, gender identity and expression (SOGIE), such as referring to LGBT status as a ‘lifestyle’ or ‘preference.’ <sup>xxxviii</sup>
- Personnel should avoid making assumptions about the SOGIE of individuals or using heteronormative language – meaning language that assumes that everyone is heterosexual or that heterosexuality is preferable or superior to any other identity. An example is asking a boy, “Do you have a girlfriend?” A neutral alternative is, “Are you dating anyone?” <sup>xxxix</sup>
- Staff working with youth must identify and become familiar with community resources to support LGBTQ clients. <sup>xl</sup>

- Personnel should signal openness and acceptance through nonverbal and environmental cues. An example is displaying LGBT-affirming images, symbols or quotations, such as the equal sign or rainbow flag.<sup>xii</sup>
- Include magazines and materials in your waiting room which promote inclusion (i.e.,LGBTQ-affirming, representation of minority populations). Where possible, employees shall display materials, such as “safe zone” or “hate-free zone” posters that convey to youth that the facility maintains an inclusive, affirming environment.
- Employees should model positive behavior when interacting with clients.<sup>xlii</sup> A great way to show LGBTQ individuals and others that your organization will be respectful of them is to model the respectful use of names and pronouns. Have staff wear name tags/use business cards with pronouns. When staff introduce themselves to young people, ask them to say their names and pronouns. For example: “Hi, my name is Aaron! I use the pronouns he, him, his and they, them, theirs.”<sup>xliii</sup>
- Ask as few questions as possible that might be seen as invasive. For example, sex at birth may not need to be known, in which case it can be omitted from the form. However, if you ask questions about a person’s sex, you should also ask about their gender identity.<sup>xliv</sup>
- Adapt intake form to include: committed partner relationship status, and non-binary gender identity, intersex, transgender MtoF, FtoM options<sup>xlv</sup>

## WORDING TEMPLATES

Following are two examples of how information can be collected in a way which lets the participant know that staff are taking their preferences into account.

### NAME<sup>xlvi</sup>

Legal Name\*: \_\_\_\_\_ Chosen Name: \_\_\_\_\_

\*Although we will only ever refer to you using the name you use, we are required for insurance purposes to collect your legal name (if applicable).

### PRONOUNS/CONTACT INFO<sup>xlvii</sup>

Home phone: \_\_\_\_\_ Is it ok to leave a message/voicemail at this number? Y/N

What name and pronouns should we use when calling this number? \_\_\_\_\_

Work phone: \_\_\_\_\_ Is it ok to leave a message/voicemail at this number? Y/N

What name and pronouns should we use when calling this number? \_\_\_\_\_

Cell phone: \_\_\_\_\_ Is it ok to leave a message/voicemail at this number? Y/N

What name and pronouns should we use when calling this number? \_\_\_\_\_

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i Reprinted with permission. 2020. ©Society for Human Resource Management.”

ii Race Forward: The Center for Racial Justice Innovations

iii Funders Together to End Homelessness: [Commitment to Racial Equity](#)

iv Funders Together to End Homelessness: [Commitment to Racial Equity](#)

v Opening Doors Fairfield County (ODFC) CoC’s Statement on Equity

vi Funders Together to End Homelessness: [Commitment to Racial Equity](#)

vii Funders Together to End Homelessness: [Commitment to Racial Equity](#)

viii The School District of Philadelphia: Office of Strategic Partnerships (2020) Racial Equity Guidance

ix Funders Together to End Homelessness: [Commitment to Racial Equity](#)

x Funders Together to End Homelessness: [Commitment to Racial Equity](#)

xi Funders Together to End Homelessness: [Commitment to Racial Equity](#)

xii Funders Together to End Homelessness: [Commitment to Racial Equity](#)

xiii Funders Together to End Homelessness: [Commitment to Racial Equity](#)

xiv CommunityWise Resource Centre (2017 ) [Anti-Racist Organizational Change: Resources & Tools for Nonprofits](#)

xv Annie. E. Casey Foundation (2014) [Race Equity and Inclusion Action Guide](#)

xvi HUD Exchange, Training (2020) [Targeting Homeless Prevention in the Midst of Covid-19](#)

xvii Adapted from Virginia Anti Violence Project

xviii Virginia Anti Violence Project

xix Adapted from NYC Administration for Children Services

xx Adapted from True Colors Fund

xxi Adapted from True Colors Fund

xxii Adapted from National Center for Lesbian Rights

xxiii Adapted from NYC Administration for Children Services

xxiv NYC Administration for Children Services

xxv Adapted from NYC Administration for Children Services

xxvi Adapted from the National Center for Lesbian Rights

xxvii Adapted from NYC Administration for Children Services

xxviii Philadelphia CoC’s Non-discrimination Policy

xxix Philadelphia CoC’s Non-discrimination Policy

xxx Philadelphia CoC’s Non-discrimination Policy

xxxi Philadelphia CoC’s Non-discrimination Policy

xxxii Adapted from National Center for Lesbian Rights

xxxiii National Center for Lesbian Rights

xxxiv Adapted from National Center for Lesbian Rights

xxxv NYC Administration for Children Services

xxxvi Adapted from National Center for Lesbian Rights

xxxvii Philadelphia CoC’s Non-discrimination Policy

xxxviii Adapted from National Center for Lesbian Rights

xxxix Adapted from National Center for Lesbian Rights

xl NYC Administration for Children Services

xli Adapted from the National Center for Lesbian Rights

xlii Adapted from the National Center for Lesbian Rights

xliiii True Colors Fund, [Inclusive Paperwork Guidance](#)

xliiv True Colors Fund, [Inclusive Paperwork Guidance](#)

xlv Bradbury-Sullivan LGBT Community Center Training Institute

xlvi Adapted from True Colors Fund, [Inclusive Paperwork Guidance](#)

xlvii True Colors Fund, [Inclusive Paperwork Guidance](#)

**APPENDIX C: CoC ACCESS/BARRIERS POLICY**

**Western Pa Continuum of Care (PA -601)**  
**Access/ Barriers Policy**

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**HUD Coordinated Entry Notice: Section 11.B.4**

**Background**

Housing First is an approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements and in which rapid placement and stabilization in permanent housing are primary goals. CoC and ESG funded projects that use a Housing First approach promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services. United States Department of Housing and Urban Development (HUD) encourages all recipients of Continuum of Care (CoC) Program to follow a Housing First approach to the maximum extent practicable. Any recipient that indicated they would follow a Housing First approach in their CoC Project Application must do so throughout the full grant term of any funded application.

**Applicability**

At minimum, all CoC- funded Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), and Transitional Housing (TH) programs will maintain marketing and tenant selection policies and procedures that follow a Housing First approach as noted below.

**Policy**

The Pennsylvania Western Region Continuum of Care requires agencies and programs alike to have the following core elements incorporated in all program types:

- Admission/tenant screening and selection practices promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, and participation in services.
- Applicants may not be rejected by agencies on the basis of poor credit or financial history, income, poor or lack of rental housing, minor criminal convictions, or behaviors that indicate lack of “housing readiness.”
- Providers accept referrals directly from shelters, street outreach, drop-in centers, and other parts of crisis response systems that are integrated into Coordinated Entry, and are frequented by vulnerable people experiencing homelessness.
- Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly tenant-driven without predetermined goals. Participation in services or program compliance is not a condition of permanent supportive housing. Rapid Re-Housing programs may require case management as condition of receiving rental assistance.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered reason for eviction by the Agency. Receiving approval from the CoC, agencies may adopt a “no use or consumption” on property rule.

**APPENDIX D: EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE,  
DATING VIOLENCE, SEXUAL ASSAULT, HUMAN TRAFFICKING, OR STALKING**

# **Western Pennsylvania Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking**

## **Emergency Transfers**

The Western PA CoC is concerned about the safety of participants in homeless assistance programs, and such concern extends to participants who are experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, human trafficking, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized.

In accordance with the Violence Against Women Act (VAWA)<sup>1</sup>, Western PA CoC homeless assistance programs providing housing or rental assistance must allow participants who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking to request an emergency transfer from the participant's current unit to another unit. This requirement applies to programs receiving Continuum of Care (CoC) and Emergency Solutions (ESG) funding.

The ability to request a transfer is available regardless of sexual orientation, gender identity, sex, or marital status<sup>2</sup>. CoC/ESG providers will work with the Western PA CoC's Coordinated Entry System to enact an emergency transfer through resources beyond those available within the provider's own organization. The ability of the Western PA CoC's Coordinated Entry System to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and on whether another dwelling unit is available and is safe to offer the participant for temporary or more permanent occupancy.

This plan identifies participants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to participants on safety and security. This plan is based on a model emergency transfer plan published by HUD, which is the Federal agency that oversees VAWA compliance of CoC/ESG-funded programs.

## **Eligibility for Emergency Transfers**

A participant is eligible for an emergency transfer when any member of the household is a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and

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<sup>1</sup> Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking, regardless of sexual orientation, gender identity, sex, or marital status.

<sup>2</sup> Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, sex, or marital status.

reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

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

### **Emergency Transfer Request Documentation**

To request an emergency transfer, the participant shall notify their housing provider/ case manager and submit [HUD Form-5383](#), a written request for an emergency transfer, to that provider. The provider must provide reasonable accommodations to this policy for individuals with disabilities. The participant's written request for an emergency transfer should include either:

1. A statement expressing that the participant reasonably believes that there is a threat of imminent harm from further violence if the participant were to remain in the same dwelling unit assisted under the provider's program; OR
2. A statement that the participant, or a member of the participant's household, was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the participant's request for an emergency transfer.

### **Confidentiality**

The housing provider and the Western PA CoC's Coordinated Entry System will keep confidential any information that the participant submits in requesting an emergency transfer, and information about the emergency transfer, unless the participant gives the housing provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the program. This includes keeping confidential the new location of the dwelling unit of the participant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, human trafficking, or stalking against the participant. See the [Notice of Occupancy Rights under the Violence Against Women Act](#) For All Participants for more information about the provider's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, human trafficking, or stalking.

### **Emergency Transfer Timing and Availability**

While the provider cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request, the provider must act as quickly as possible/ with urgency to move a participant who is a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking to another unit, subject to availability and safety of a



unit, either within the provider's own inventory or through a transfer facilitated through the Western PA CoC's Coordinated Entry System. The goal is to move the participant to a new unit within 10 business days.

If a participant reasonably believes a proposed transfer would not be safe, the participant may request a transfer to a different unit. If a unit is available, the transferred participant must agree to abide by the terms and conditions that govern occupancy in the unit to which the participant has been transferred. Neither the provider, nor the Western PA CoC's Regional Coordinated Entry System Specialist may be able to transfer a participant to a particular unit if the participant has not or cannot establish eligibility for that unit.

At the participant's request, the housing provider will also assist participants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking that are attached to this plan.

**Protocol for emergency transfer request** If the provider cannot transfer the participant through resources operated by/ available through their own organization, the housing provider/case manager and appropriate Coordinated Entry Team member will follow the protocol outlined below with the goal of moving the participant to a new unit within 10 business days.

1. Housing Provider/ case manager will obtain written consent from the participant to release the following information to the appropriate Coordinated Entry Team member:
  - a. county(ies)/ community(ies) where the participant wishes to live/ deems safe;
  - b. The type of unit needed by the household (# of bedrooms, ADA accessibility, etc.)
  - c. Information necessary to establish eligibility (e.g, disability status, history of homelessness, etc.)
2. The housing provider shall contact the appropriate Coordinated Entry Team member to request an Emergency Transfer for the participant within 48 business hours of receiving the Emergency Transfer Request from the participant. Within the Coordinated Entry Team, the housing provider should first contact the DV CE Specialist; if the DV CE Specialist is unavailable, the housing provider should contact the appropriate Regional Coordinated Entry Specialist; and if neither the DV CE Specialist nor the Regional Coordinated Entry Specialist are available, the housing provider should contact the Coordinated Entry Manager.
3. The appropriate Coordinated Entry team member will reach out to housing providers that serve the county(ies)/ community(ies) where the participant has expressed interest in living within 48 business hours of receiving the Emergency Transfer Request from the housing provider. The Coordinated Entry team member will limit information shared with prospective providers to the information listed in bullet #1 of this protocol and request that any provider with an opening in their program accept the transferring participant.

The housing provider staff and Coordinated Entry Team member shall not share information

about the participant requesting the Emergency Transfer with anyone internal or external to their organization without the express written consent of the participant. No information about the Emergency Transfer Request shall be entered into HMIS.

## **Safety and Security of Participants**

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the participant is urged to take all reasonable precautions to be safe.

Participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Participants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Information and resources for survivors of human trafficking can be found on the Pennsylvania Office of Victim Services website at <https://pcv.pccd.pa.gov/HT>. To best support a survivor immediately, please reach out to the National Human Trafficking Hotline at 888-373-7888.

Participants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at [https://www.victimsofcrime.org/our\\_programs/stalking-resource-center](https://www.victimsofcrime.org/our_programs/stalking-resource-center).

In Pennsylvania, there are different types of Victim Service Providers (VSPs) that support survivors of Gender Based Violence.

- Domestic Violence (DV) service providers - serve only survivors of DV
- Sexual Assault (SA or SV) service providers - serve only survivors of SA
- Human Trafficking (HT) service providers - serve only survivors of HT
- Dual service providers - serve survivors of DV, SA and HT (if they are also experiencing DV or SA)
- Comprehensive service providers - serve DV, SA, HT survivors and survivors of other crimes

In Pennsylvania, there are two statewide coalitions that support many of these VSPs as member programs: [Pennsylvania Coalition Against Domestic Violence](#) (PCADV) and [Pennsylvania Coalition to Advance Respect](#) (PCAR). These coalitions provide guiding standards, funding, and oversight for member programs. There is no state recognized HT coalition, but both PCADV and PCAR support member programs in serving survivors of HT.

**Attachment:** Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking.

**List of Victim Service Providers in each county of the Western PA CoC**

**County Hotline Domestic Violence Program Name**

<b>County</b>	<b>Hotline Number</b>	<b>Victim Service Provider</b>	<b>Survivors Served</b>
Armstrong	800-841-8881	HAVIN, Inc.	Dual DV/SA
Butler	800-400-8551	Victim Outreach Intervention Center	Dual DV/SA
Cameron	800-226-4759	C.A.P.S.E.A	Dual DV/SA
Clarion	800-992-3039	SAFE (Stop Abuse For Everyone)	DV
Clarion	800-793-3620	Passages Inc	SA
Clearfield	800-598-3998	Community Action, Inc./Crossroads Project	DV
Clearfield	800-793-3620	Passages Inc	SA
Crawford	888-881-0189	Women’s Services, Inc.	Dual DV/SA
Elk	800-226-4759	C.A.P.S.E.A.	Dual DV/SA
Fayette	800-791-4000	Domestic Violence Services of Southwestern PA, Inc.	DV
Fayette	724-437-3737	Community Resources of Fayette County	SA
Forest	800-338-3460	A Safe Place, Inc.	Comprehensive
Greene	800-791-4000	Domestic Violence Services of Southwestern PA, Inc.	DV
Greene	888-480-7283	SW PA Human Services CARE Center – STTARS	SA
Indiana	800-435-7249	Alice Paul House	Dual DV/SA
Jefferson	800-598-3998	Community Action, Inc./ Crossroads Project	DV
Jefferson	800-793-3620	Passages Inc	SA
Lawrence	724-652-9036	Arise Lawrence County	Comprehensive
McKean	888-822-6325	YWCA Victims' Resource Center	Dual DV/SA
Mercer	888-981-1457	AWARE	Dual DV/SA
Potter	877-334-3136	A Way Out	Dual DV/SA
Venango	800-243-4944	PPC Violence Free Network	Dual DV/SA
Warren	800-338-3460	A Safe Place, Inc.	Comprehensive
Washington	800-791-4000	Domestic Violence Services of Southwestern PA, Inc.	DV
Washington	888-480-7283	SW PA Human Services CARE Center – STTARS	SA
Westmoreland	<a href="tel:724-224-1266">724-224-1266</a>	Alle Kiski Hope Center	DV
Westmoreland	888-832-2272	Blackburn Center	Comprehensive

**Western Pennsylvania CoC – Receiving Program Emergency Transfer Request  
Participant Authorization to Share Personal Information**

**[APPROPRIATE AGENCY LETTERHEAD]**

**Purpose of this Authorization Form:** You have requested to transfer to another unit of housing because there is a threat of imminent harm from further violence if you remain in your current housing. In order to identify a new, safe unit for you, you are being asked to sign this form to authorize **[Insert Program/ Agency Name]** to share some of your information with **[Insert Receiving Program/ Agency Name]** that may have an available opening/ unit for you to move to.

By signing this form, you are giving the agency named at the top of this form permission to share your information with **[INSERT Receiving Program/ Agency Name]** for the purposes of transferring you to the next available unit of housing for which you qualify and deem safe.

I, \_\_\_\_\_, authorize **[INSERT Program/Agency Name]** to share:

**information and documents limited to those necessary to determine my eligibility for housing and transfer me to a new, safe unit of housing, including:**

- County(ies)/Community(ies) where I wish to live/ deem as safe
- The type of unit needed by my household (# of bedrooms, ADA accessibility, etc.)
- Information necessary to establish eligibility (e.g, disability status, history of homelessness, etc.)
- Other Specific Information to be released (described below):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
**With the following staff person at **[INSERT Receiving Program/ Agency Staff Name]** responsible for identifying my new, safe unit of housing.**

\_\_\_\_\_  
The staff person at the receiving program/ agency must abide by the following limitations in their use of the information release.

This information has been disclosed to you from records whose confidentiality is protected by state and federal law, which prohibit you from making any further disclosure of it without the specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations.

A general authorization for the release of information is not sufficient. I also understand that once released, this information may not be protected by confidentiality or non-disclosure laws. The information could potentially be used against me by the agency / person to whom it is released.

My signature verifies that I know what information is being disclosed and have had the opportunity to correct the data to make certain it is accurate. I am aware that this consent can be revoked at any time by notifying my case manager orally or in writing, and /or specifying an event or condition upon which my consent will expire without revocation. I am also aware of the consequences that might occur as a result of signing this form, or of my refusal to do so.

My signature means that I have read this form and / or have had it read and explained to me in a language I can understand. I have checked this form, and upon signing will receive a copy, if I so choose. If I do not specify revocation, this consent form will automatically expire in 30 days on \_\_\_\_\_ . A new release will be necessary for any exchange of information after this point.

The above consent shall automatically expire on

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*(Special Event)*

*(Date Condition)*

Or within 30 days.

**I understand that this release is valid when I sign it and that I may withdraw my consent to this release at any time either orally or in writing.**

Participant Name

(printed):

Participant

Signature:

\_\_\_\_\_

Date:

\_\_\_\_\_

Time:

Agency Witness

(printed):

Agency Witness

Signature:

\_\_\_\_\_

Date:

\_\_\_\_\_

Time:

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**Western Pennsylvania CoC – Coordinated Entry Emergency Transfer Request  
Participant Authorization to Share Personal Information**

**[APPROPRIATE AGENCY LETTERHEAD]**

Purpose of this Authorization Form: You have requested to transfer to another unit of housing because there is a threat of imminent harm from further violence if you remain in your current housing. In order to identify a new, safe unit for you, you are being asked to sign this form to authorize **[Insert Program/ Agency Name]** to share some of your information with the Western Pennsylvania CoC Coordinated Entry Regional Specialist or Manager.

By signing this form, you are giving the agency named at the top of this form permission to share your information with the Western Pennsylvania CoC Coordinated Entry Regional Specialist or Manager for the purposes of transferring you to the next available unit of housing for which you qualify and deem safe.

I, \_\_\_\_\_, authorize **[Insert Program/Agency Name]** to share:

**information and documents limited to those necessary to determine my eligibility for housing and transfer me to a new, safe unit of housing, including:**

- County(ies)/Community(ies) where I wish to live/ deem as safe
- The type of unit needed by my household (# of bedrooms, ADA accessibility, etc.)
- Information necessary to establish eligibility (e.g, disability status, history of homelessness, etc.)
- Other Specific Information to be released (described below):

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**with the following Western Pennsylvania CoC Coordinated Entry Regional Specialist or Manager responsible for identifying my new, safe unit of housing: [CHECK THE APPROPRIATE BOX BELOW AND PRINT THE PERSON'S NAME ON THE LINE PROVIDED]**

- CE DV Specialist \_\_\_\_\_
- Region 1 Specialist \_\_\_\_\_
- Region 2 Specialist \_\_\_\_\_
- Region 3 Specialist \_\_\_\_\_
- Region 4 Specialist \_\_\_\_\_
- Coordinated Entry Manager \_\_\_\_\_

The Coordinated Entry Regional Specialist or Manager must abide by the following limitations in their use of the information release.

This information has been disclosed to you from records whose confidentiality is protected by state and federal law, which prohibit you from making any further disclosure of it without the specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations.

A general authorization for the release of information is not sufficient. I also understand that once released, this information may not be protected by confidentiality or non-disclosure laws. The information could potentially be used against me by the agency / person to whom it is released.

My signature verifies that I know what information is being disclosed and have had the opportunity to correct the data to make certain it is accurate. I am aware that this consent can be revoked at any time by notifying my case manager orally or in writing, and /or specifying an event or condition upon which my consent will expire without revocation. I am also aware of the consequences that might occur as a result of signing this form, or of my refusal to do so.

My signature means that I have read this form and / or have had it read and explained to me in a language I can understand. I have checked this form, and upon signing will receive a copy, if I so choose. If I do not specify revocation, this consent form will automatically expire in 30 days on \_\_\_\_\_ . A new release will be necessary for any exchange of information after this point.

The above consent shall automatically expire on

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*(Special Event)*

*(Date Condition)*

Or within 30 days.

**I understand that this release is valid when I sign it and that I may withdraw my consent to this release at any time either orally or in writing.**

Participant Name  
(printed):

Participant

Signature:

\_\_\_\_\_

Date:

\_\_\_\_\_

Time:

Agency Witness  
(printed):

Agency Witness

Signature:

\_\_\_\_\_

Date:

\_\_\_\_\_

Time:

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**APPENDIX E: VIOLENCE AGAINST WOMEN ACT OF 2022 REQUIREMENTS FOR HOUSING PROVIDERS**



## **Violence Against Women Act of 2022 Requirements for Housing Providers**

The Violence Against Women Act, reauthorized in 2022, includes protections for survivors who are applying for or residing in covered housing programs, which includes ESG and CoC Program funded programs, to help keep them safe and reduce their likelihood of experiencing homelessness.

HUD has created the following forms to support housing providers comply with the requirements of VAWA. These forms are currently undergoing revision and renewal:

- [Form HUD-5380, Notice of Occupancy Rights under VAWA](#)
- [Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking, and Alternate Documentation](#)
- Form HUD-5383, Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
- [HUD-91067 VAWA Lease Addendum](#)

The Western PA CoC has created the following Cover Sheets for HUD's VAWA forms to summarize and explain them in plain language. CoC and ESG housing programs are required to provide participants with HUD's VAWA forms along with these Western PA CoC Cover Sheets to support participants understand their rights under VAWA.

**Notice of Occupancy Rights under the Violence Against Women Act**  
**HUD Form-5380 Cover Sheet**

What are the VAWA Housing Protections?

- **Participants cannot be denied and cannot lose/ be evicted from housing or housing assistance** because they (or a household member) are or were a victim of VAWA violence/ abuse, because of problems (poor rental or credit history, criminal record, noise complaints, property damage) that have been documented are a direct result of being or having been a victim, or for someone else's criminal actions that are directly related to abuse/violence against the victim.  
\* VAWA will not prevent eviction, termination, or removal if other tenants on the premises or housing staff are shown to be in immediate, physical danger that could lead to serious bodily harm or death if the victim is not evicted or removed from assistance.
- **Emergency Transfers:** Participants have the right, even if they are behind on rent/ not in good standing, to request an emergency transfer from their current housing unit to another housing unit for safety reasons related to violence/abuse if:
  - The participant believes that there is imminent harm from further violence or trauma if they stay in the same housing unit; **OR**
  - a victim of sexual assault, either reasonably believes that there is a threat of imminent harm from further violence or trauma if they stay in the same unit, or the sexual assault occurred on the premises and the victim requests an emergency transfer within 90 days (including holidays and weekend days) of when the assault occurred.\* The emergency transfer request, information provided by the participant to make the request, and the location of the new housing unit must be kept strictly confidential by the housing provider.
- **Lease Bifurcation:** In certain circumstances, if the participant prefers to remain in their current housing unit, it may be possible to evict the perpetrator of violence/abuse or have them removed from the participant's lease.
  - **Reasonable Time for Remaining Household members to continue to receive assistance, establish eligibility, or move:** If the perpetrator of violence/abuse was the person that made the household eligible for the program, the remaining household members will have an opportunity to establish that they are eligible to remain in the program or to find other housing.
- **Confidentiality:** Housing providers must keep the information shared by participants about why they need VAWA housing protections confidential. The following situations are exceptions:
  - The victim gives the housing provider written permission to share specific information for a limited time; or
  - The housing provider needs to use the information in an eviction proceeding or hearing; or
  - If other applicable law requires the housing provider to share the information.
- **Prohibition on Retaliation:** it is illegal for a landlord or housing provider to coerce, intimidate, threaten, interfere with, or retaliate against any person who exercises or assists or encourages a person to exercise any rights or protections under VAWA's housing provisions.
- **The Right to Report Crime and Emergencies from One's Home:** Landlords, homeowners, tenants, residents, occupants, guests of, or applicants for, any housing have the right to seek law enforcement or emergency assistance on their own behalf or on behalf of another person in need of assistance. They may not be penalized based on their requests for assistance, based on criminal activity for which they are a victim, or based on activity for which they are otherwise not at fault under a law, ordinance, regulation, or policy adopted by or enforced by a governmental entity that

receives certain HUD funding. This means it is unlawful to threaten or subject individuals seeking assistance to any of the following: monetary or criminal penalties, fines, or fees; eviction; refusals to rent or renew tenancy; refusals to issue an occupancy or landlord permit; withdrawing certifications or permits for operation of the property; and designation of the property as a nuisance or a similar negative designation.

How do participants access their VAWA housing protections? Participants must ask the housing provider for VAWA housing protections. The housing provider may request documentation; this request must be in writing and must give the participant at least 14 business days (weekends and holidays do not count) to submit documentation. Participants must submit documentation by the deadline in order to be afforded their VAWA housing protections. Participants may submit any one of the following as documentation:

1. [HUD-5382](#) Self-Certification Form: The housing provider is required to supply the participant with this form; either the victim or someone else can complete the form; **OR**
2. A statement from a victim/survivor service provider, attorney, mental health professional or medical professional who has helped the victim address incidents of VAWA violence/abuse. Both the victim and the professional must sign the statement; **OR**
3. A police, administrative, or court record (such as a protective order) that shows a person was a victim of VAWA violence/abuse; **OR**
4. If allowed by the housing provider or landlord, any other statement/ evidence provided by the victim.

Have a participant's protections under VAWA been denied? If a participant believes that the housing provider has violated these VAWA rights, they may seek help by contacting **[INSERT LOCAL HUD FHEO FIELD OFFICE & CONTACT INFORMATION]**. Participants may also find additional information on filing VAWA complaints at <https://www.hud.gov/VAWA> and <https://www.hud.gov/fairhousing/fileacomplaint>

Participants who feel they have experienced discrimination can file a Housing & Commercial Property Discrimination Complaint with the Pennsylvania Housing Relations Commission (PHRC) at <https://www.pa.gov/en/services/phrc/file-a-housing---commercial-property-discrimination-complaint.html> or by calling a regional PHRC office: <https://www.pa.gov/en/agencies/phrc/contact-us.html>

[HUD-5380](#) has been translated into other languages. Translated forms can be found here: [https://www.hud.gov/program\\_offices/administration/hudclips/forms/hud5a](https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a)

**Reasonable Accommodation:** If the participant has a disability, the housing provider must provide reasonable accommodations to rules, policies, practices, or services that may be necessary to allow the participant to equally benefit from VAWA protections (for example, giving them more time to submit documents, or assisting them with filling out forms). Background Information: The Violence Against Women Act (VAWA) is a federal law that provides housing protections to victims of domestic violence, dating violence, sexual assault, or stalking, regardless of the victim's sexual orientation, gender identity, sex, or marital status. Housing providers that receive HUD funding must comply with this law. The attached HUD Form-5380 Notice of Occupancy Rights under VAWA is to be used by Western PA CoC housing providers to inform all households participating in HUD funded housing of their VAWA housing protections; it must be provided at a minimum: (1) When a household is denied housing assistance from a program, (2) When a household is enrolled in / begins receiving housing assistance from a program, (3) When a household receives a notification of eviction, and (4) When a household is notified their housing assistance is ending / being terminated.

## **Self-Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking** **HUD Form-5382 Cover Sheet**

**Background Information:** The Violence Against Women Act (VAWA) is a federal law that provides certain housing protections to victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking, regardless of the victim's sexual orientation, gender identity, sex, or marital status. The attached form should be provided to households along with [HUD-5380](#) Notice of Occupancy Rights under VAWA at a minimum:

1. When a household is denied housing assistance from a program;
2. When a household is enrolled in / begins receiving housing assistance from a program;
3. When a household receives a notification of eviction; and
4. When a household is notified their housing assistance is ending / being terminated.

**Purpose of the Attached Form:** If a participant asks their housing provider for VAWA housing protections, the participant may be asked to provide documentation that they are a victim of a crime that VAWA protects. The housing provider must give a participant at least 14 business days (weekends and holidays do not count) to respond to the written request for this documentation. The attached self-certification form is 1 of 4 HUD-approved ways of documenting a person's status as a victim. Housing providers must accept the attached form as sufficient documentation, and may not ask for nor require additional documentation to prove a participant's victim status unless the housing provider receives conflicting information (such as self-certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator) about the violence/abuse.

Participants may choose to submit any 1 of the 4 VAWA-approved types of documentation:

1. (Attached) [HUD-5382](#) Self-Certification Form: The housing provider is required to supply the participant with this form; either the victim or someone else can complete the form; **OR**
2. A statement from a victim/survivor service provider, attorney, mental health professional or medical professional who has helped the victim address incidents of VAWA violence/abuse. Both the victim and the professional must sign the statement; **OR**
3. A police, administrative, or court record (such as a protective order) that shows a person was a victim of VAWA violence/abuse; **OR**
4. If allowed by the housing provider or landlord, any other statement/ evidence provided by the victim.

**Confidentiality:** Housing providers must keep confidential the fact that a participant is a victim, and any information the participant submits, unless the participant gives the housing provider written permission to release specific information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the program. When a participant requests and is granted an emergency transfer to a new housing unit, the housing provider must keep confidential the new location of the dwelling unit of the participant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, human trafficking, or stalking against the participant.

HUD-5382 has been translated into other languages. Translated forms can be found here:  
[https://www.hud.gov/program\\_offices/administration/hudclips/forms/hud5a](https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a)

**Reasonable Accommodation:** If the participant has a disability, the housing provider must provide reasonable accommodations to rules, policies, practices, or services that may be necessary to allow the victim to equally benefit from VAWA protections (for example, giving the victim more time to submit documents, or assisting them with filling out forms).

**Emergency Transfer Request for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking**  
**HUD Form-5383 Cover Sheet**

**Background Information:** A participant is eligible for an emergency transfer when any member of the household is a victim of domestic violence, dating violence, sexual assault, or stalking, and reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. Participants are eligible for emergency transfers regardless of a victim's age or actual or perceived sexual orientation, gender identity, sex, or marital status. Participants are eligible for emergency transfers regardless of whether or not they are in "good standing."

To request an emergency transfer, the participant shall notify their housing provider/ case manager and submit a written request for a transfer to that provider. The provider must provide reasonable accommodations to the Emergency Transfer policy for individuals with disabilities that may be necessary to allow a participant to equally benefit from VAWA protections. The participant's written request for an emergency transfer should include either:

1. A statement expressing that the participant reasonably believes that there is a threat of imminent harm from further violence if the participant were to remain in the same dwelling unit assisted under the provider's program; OR
2. A statement that the participant, or a member of the participant's household was a sexual assault victim and that the sexual assault occurred on the premises during the 90- calendar-day period preceding the participant's request for an emergency transfer.

**Purpose of HUD Form-5383:** A participant may use this form to request an emergency transfer and certify that they meet the conditions for an emergency transfer under the Violence Against Women Act ("VAWA"). Submitting this form does not necessarily mean that a participant will receive an emergency transfer.

Upon receiving the request for an emergency transfer, the housing provider may request documentation supporting that the participant is a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking in addition to completing the emergency transfer request form. The request can be met by completing and submitting the VAWA Self-certification Form (Form HUD-5382), unless the housing provider receives conflicting information (such as self-certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator) about the violence/abuse. If a participant has third-party documentation that demonstrates why they are eligible for an emergency transfer, a participant may instead choose to submit that documentation to the housing provider.

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

HUD-5383 has been translated into other languages. Translated forms can be found here:

[https://www.hud.gov/program\\_offices/administration/hudclips/forms/hud5a](https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a)

**APPENDIX F: PA HMIS COLLABORATIVE CONSENT**

# PA HMIS Collaborative Client Consent

## Release of Information via PA HMIS

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The Pennsylvania Homeless Management Information System (“PA HMIS”) serves the Pennsylvania Continuums of Care Collaborative, a group of agencies (“PA HMIS Participating Agencies”) working together to provide services to individuals and families in Pennsylvania who are homeless or at risk of becoming homeless. In an effort to end homelessness, PA HMIS allows the Commonwealth of Pennsylvania and PA HMIS Participating Agencies to use this system to efficiently collaborate, identify, coordinate, and evaluate individual services needed. The PA HMIS is also used to produce nonidentifying, aggregate reports that can be used to track program performance which is necessary to receive program funding from the federal government, identify unfilled service needs, and plan for new service provision.

This process is beneficial to improving your case management and received services, as well as assisting PA HMIS Participating Agencies to locate multiple housing or service options. Additionally, sharing information between PA HMIS Participating Agencies can reduce the number of times you are asked for repeated information. By consenting to share this information with participating agencies, you will allow PA HMIS to provide better coordination between PA HMIS Participating Agencies in an effort for you to obtain and maintain permanent housing.

Information collected in the PA HMIS database is protected in compliance with the standards set forth in the Health Insurance Portability and Accountability Act (HIPAA). Every person and agency that is authorized to read or enter information into the database has signed an agreement to maintain the security and confidentiality of your information. Any person or agency that is found to violate their agreement may have their access rights terminated and may be subject to further penalties including legal action.

### **I UNDERSTAND THAT:**

- In an effort to end homelessness and to better serve me and/or my family, the PA HMIS Participating Agency identified at the bottom of this form will collect and may share my identifying information with other PA HMIS Participating Agencies via PA HMIS.
- The intention and purpose of collecting and sharing my information is to help PA HMIS Participating Agencies better understand and assist my/our needs, and to produce non-identifying, aggregate reports to the federal government that can be used to track the program performance of these agencies.
- The PA HMIS participating agencies have signed agreements and are bound to implement policies to maintain my information in a secure and confidential manner, as mandated by Federal and State laws.
- The release of my information does not guarantee that I will receive assistance. Alternatively, refusing to release my information will not affect my opportunity to receive assistance.
- This authorization will remain in effect for a period of up to 7 years or until I revoke it in writing. I may revoke authorization at any time by returning to any previously visited PA HMIS Participating Agency and signing a new consent form using the “I do not agree” option. If I revoke my authorization or this authorization expires, all information about me already in the database will remain to retain usage history; however, it will be inactive and not updated. I further understand that any revocation of this consent will not affect the waiver of confidentiality as to information already disclosed.

## PA HMIS Collaborative Client Consent Release of Information via PA HMIS

- If I decline to release my information, it will be hidden from all other PA HMIS participating agencies, except in the case of a referral. If I need to be referred to another agency for services, my information will be forwarded to only that agency, regardless of my recorded data sharing preference.

**Please choose an option:**

- I **agree** to allow sharing of my information via the PA HMIS system with PA HMIS participating agencies.
- I **do not agree** to allow sharing of my information via the PA HMIS system with PA HMIS Participating Agencies. I understand that if I need to be referred to another agency, only the data necessary to complete the referral will be forwarded.

_____ Client Name <i>(Please print)</i>	_____ Client Signature	_____ Date
---	---------------------------	---------------

_____ Guardian Name, if applicable <i>(Please print)</i>	_____ Guardian Signature, if applicable	_____ Date
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List Dependent(s) Name(s), if applicable  
(Note: If dependents are not presenting for services at the same time as the guardian, or the guardian wishes to record different individual consent responses, use a separate consent form for each dependent.)

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
PA HMIS Participating Agency Name *(Please print)*

_____ Agency Personnel <i>(Please print)</i>	_____ Agency Personnel Signature	_____ Date
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**APPENDIX G: CoC FAIR AND EQUAL ACCESS POLICY**

**WESTERN PA CONTINUUM OF CARE (PA -601)**  
**Fair and Equal Access Policy**

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**Policy**

The Pennsylvania Western Region Continuum of Care will ensure fair and equal access to the Coordinated Entry system programs and services for all consumers regardless of actual or perceived race, color, religion, national origin, age, gender identity, pregnancy, citizenship, familial status, household composition, disability, Veteran status, sexual orientation, or domestic violence status.

To ensure fair access by individuals with disabilities, physical and communication accessibility barriers must be addressed by appropriate accommodation within each Coordinated Entry System.

All authorized user agencies who enter into an MOU for Coordinated Entry and agree to take full responsibility for complying with Fair Housing and all other funding and program requirements. If an individual's self-identified gender or household composition creates challenging dynamics among residents within a facility, the host program is required to make every effort to accommodate the individual or assist in locating alternative accommodation that is appropriate and responsive to the individual's needs.

**APPENDIX H: YOUTH HOMELESSNESS DEMONSTRATION PROGRAM (YHDP) WRITTEN STANDARDS**

# Standards for YHDP-Funded Programs in the Western PA CoC

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In addition to adhering to the standards for all projects and standards by project type outlined within the Written Standards, projects funded under the Youth Homelessness Demonstration Program (YHDP) have additional requirements and standards. While projects funded under YHDP are expected to adhere to the Written Standards, YHDP-funded programs have more flexible eligibility and assistance guidelines as outlined in this section.

As of 2024, there are four types of projects funded through YHDP in the Western PA CoC:

1. Supportive Services Only – System Navigation (referred to in this section as “System Navigation”)
2. Supportive Services Only – Host Homes (referred to in this section as “Host Homes”)
3. Permanent Supportive Housing (referred to in this section as “PSH”)
4. Transitional Housing Rapid Rehousing Joint Component (referred to in this section as “TH-RRH”)

Project descriptions as outlined in the YHDP New Project RFP are included at the back of this section.

## Access

- **System Navigation** – Can accept referrals from community/agency partners and/or Coordinated Entry.
- **Host Homes** - Projects can utilize Host Homes as crisis intervention, in cases of emergency (e.g., safety, lack of emergency shelter resources, etc.), but should otherwise follow the Written Standards for filling units. When Host Homes are used as emergency housing, youth must be assessed and added to the CES within 24 hours following enrollment.
- **PSH and TH-RRH** – Referrals for PSH and the RRH component of TH-RRH must come through Coordinated Entry.
  - Projects can utilize TH as crisis intervention, in cases of emergency (e.g., safety, lack of emergency shelter resources, etc.), but should otherwise follow the Written Standards for filling units. When TH is used as emergency housing, youth must be assessed and added to the CES within 24 hours following enrollment.
- **General requirements regarding access:**
  - Project should be accessible to people with disabilities.
  - Project should be outwardly LGBTQ friendly. This may include but is not limited to inclusive signage and advertising language, inclusive paperwork, and hiring diverse staff.
  - Project should be well-advertised. This includes proactively marketing the program to community partners.
    - Though RRH and PSH programs can only accept referrals through Coordinated Entry, programs should proactively advertise these programs and connect young people to Coordinated Entry as needed to access these resources.

## Eligibility

- **System Navigation**
  - Youth 24 and under. Note that youth do not age out when turning 25.
  - Youth meeting any of the following HUD categories of homelessness are eligible:
    - Category 1: Literally Homeless
    - Category 2: Imminent Risk of Homelessness
    - Category 4: Fleeing/Attempting to Flee Domestic Violence
- **Host Homes**
  - Youth 24 and under. Note that youth do not age out when turning 25.
  - Youth meeting any of the following HUD categories of homelessness are eligible:
    - Category 1: Literally Homeless
    - Category 2: Imminent Risk of Homelessness
    - Category 4: Fleeing/Attempting to Flee Domestic Violence
- **PSH**
  - Youth 18-24. Note that youth do not age out when turning 25.
  - Youth must have a disabling condition as defined by HUD. A disabling condition is one or more of the following:
    - A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that:
      - Is expected to be long-continuing or of indefinite duration;
      - Substantially impedes the individual's ability to live independently; and
      - Could be improved by the provision of more suitable housing conditions.
    - A developmental disability;
    - The disease of acquired immunodeficiency syndrome (AIDS) or any condition arising from the etiologic agency for acquired immunodeficiency syndrome (HIV).
  - Youth meeting any of the following HUD categories of homelessness are eligible:
    - Category 1: Literally Homeless
    - Category 2: Imminent Risk of Homelessness
    - Category 4: Fleeing/Attempting to Flee Domestic Violence
- **TH-RRH**
  - Youth 18-24. Note that youth do not age out when turning 25.
  - TH-RRH Youth meeting any of the following HUD categories of homelessness are eligible:
    - Category 1: Literally Homeless
    - Category 2: Imminent Risk of Homelessness
    - Category 4: Fleeing/Attempting to Flee Domestic Violence

### **Prioritization**

- **System Navigation, Host Homes, TH portion of TH-RRH**
  - Programs have discretion when prioritizing resources through these project types. In general, if programs are unable to serve all youth seeking services, they should prioritize youth who are literally homeless with priority given first to youth who are unsheltered.
- **PSH, RRH portion of TH-RRH**
  - Programs should follow the Prioritization standards as outlined in the Written Standards when filling vacancies.

## Documentation

- Programs must follow the documentation requirements by project type as outlined in the Written Standards.
- **Regarding documentation of homelessness for PSH and TH-RRH programs:** As provided by the Consolidated Appropriations Act, 2022, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under YHDP. Programs funded under YHDP must accept self-certification of homelessness if third-party documentation is not available.
- Programs funded under YHDP should practice transparency related to documentation requirements for enrollment into YHDP-funded programs. In general, programs should not require documentation above and beyond the HUD requirements in order to enroll or serve youth participants. In addition, agencies should have a written policy related to youth participants who request to view their case files that includes process to request, timeline for fulfilling request, and redaction.

## Duration and Amounts

In general, the length of time in YHDP funded programs should be individualized and tailored to the unique needs of the participants. However, some programs may have limits on the maximum duration of assistance.

- **System Navigation**
  - There is no defined maximum duration for system navigation services. This should be tailored to the needs of the youth, with the goal of obtaining permanent housing stability as quickly as possible. Aftercare services are also available. Youth and navigator should determine what aftercare, if any, is needed.
- **Host Homes**
  - There is no defined maximum duration for host home services. The goal of the program is to be short-term; however, length of assistance should be tailored to the needs of the youth and based on youth and host agreement, with the goal of obtaining permanent housing stability as quickly as possible. Aftercare services are also available. Youth and navigator should determine what aftercare, if any, is needed.
- **PSH**
  - There is no maximum length of assistance for PSH. PSH is designed to be a permanent housing resource for individuals with disabilities who need additional support to ensure housing stability. If a participant no longer needs the service component of PSH, programs may assist participants with “Move On” resources (see pages 30-31 of the Written Standards). Moving on from PSH should be client-driven and never mandatory.
  - Housing could be in the youth’s own apartment or shared housing.
- **TH-RRH**
  - Projects may serve participants for up to 24 months total in each project component. Maximum period of assistance in TH is 24 months and 24 months in RRH.<sup>1</sup>

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<sup>1</sup> <https://files.hudexchange.info/resources/documents/YHDP-TH-RRH-Joint-Component-Project.pdf>

- Projects should follow guidance in the Written Standards regarding rent and utility calculations for RRH, including participant contributions to rent.
- Housing could be in the youth’s own apartment or shared housing.

### **Supportive Services Standards (For All Project Types)**

Programs should follow supportive services standards as outlined in the Written Standards. Below are additional standards that YHDP funded programs should follow:

- Staff working in YHDP funded programs must be trained in Positive Youth Development, Motivational Interviewing, Managing Aggressive Behaviors, Trauma-Informed Care, Equity and Power Sharing and Racial/LGBTQIA Equity. All new staff must be trained in these areas within the first 6 months of beginning their role. All staff should receive retraining on these topics at least every 2 years.
- YHDP-funded programs must ensure that their programs integrate all elements outlined in the USICH Framework to End Youth Homelessness: 1) stable housing, 2) permanent connections, 3) education/employment, and 4) social-emotional wellbeing. While stable housing is the focus of programs, programs must ensure that they are incorporating a variety of supportive services to support participants. YHDP-funded programs should support participants with independent living skills development. Supportive services may be provided either through YHDP grant or connection to other services. When making referrals to other service providers, YHDP-funded programs should ensure a “warm hand-off” to the other service provider and should also follow up to ensure a successful referral.
- Youth must be involved in implementing and evaluating the project.
- Programs must ensure that youth choice is prioritized at all stages of implementing YHDP-funded programs. This includes offering choice in how to participate in services, what services are desired, what type of housing is the best fit, who a young person wants to live with, and more. Programs should engage in a partnership with young people and work to minimize the power imbalance that is inherent in operating housing and service programs.
- Youth housing arrangements must be driven by client choice. This includes determining what type of housing situation is best (for example: shared housing vs. own apartment), location of housing, and who the young person will live with. If the young person has pets, programs should accommodate this and help the young person identify housing that is pet-friendly.
- Programs should be proactive in reaching out and engaging young people. This includes engaging in multiple methods of communication, checking in regularly, sending reminders, and whatever else may be helpful for the youth to engage with the program’s services. Methods of communication should be driven by the young persons’ preferences.

## **Additional Guidance for YHDP-Funded Programs (as outlined in the YHDP New Project RFP)**

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### **PROGRAM DESCRIPTIONS**

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## Joint Transitional Housing/ Rapid Rehousing

Summary	Interventions of this type are designed to allow for immediate emergency housing of youth while permanent Rapid Rehousing solutions are obtained. With the absence of sufficient (geographically limited) emergency shelter in the CoC, the joint TH-RRH programming is an excellent model to quickly provide crisis housing as needed (through Transitional Housing) while youth are being connected with appropriate permanent housing solutions.
Target Population	TH: Youth under age 24; RRH: Youth aged 18 -24
Project Requirements	<p>Proposed project adheres to the Housing First model.</p> <p>Proposed projects will be targeting geographic areas of need.</p> <p>Proposed projects will have supportive services to meet each individual's needs. This will be provided either through YHDP grant or connection to other services.</p> <p>Proposed project provides enough rapid re-housing assistance to ensure that at any given time a program participant may move from transitional housing to permanent housing. (This is generally described as having twice as many RRH units available than TH crisis beds.)</p> <p>Projects may serve persons for up to 24 months total in each project component.</p> <p>Projects can utilize TH as crisis intervention, in cases of emergency (e.g. safety, lack of emergency shelter resources, etc.), but should otherwise follow the Written Standards for filling units. When TH is used as emergency housing, youth must be assessed and added to the CES within 24 hours following enrollment.</p> <p>Proposed projects will house 100% of youth through CE for RRH.</p>
HUD Homeless Categories & HUD CoC Project Type	Category 1, 2, & 4 Joint Transitional Housing - Rapid Rehousing (TH-RRH)
Innovation Opportunities	A joint TH-RRH project could provide support to youth in higher education for gap housing (over winter and/or summer break) and/or year-round housing services. RRH portion could be in the youth's own apartment or shared housing.
Resources	<a href="https://files.hudexchange.info/resources/documents/YHDP-TH-RRH-Joint-Component-Project.pdf">https://files.hudexchange.info/resources/documents/YHDP-TH-RRH-Joint-Component-Project.pdf</a>

**Coaching, Systems Navigation, Outreach Response, Support Services**



Summary	<p>(a) Services may be provided through coaching, peer support, outreach, systems navigators and/or a team-based approach, providing a primary point of contact for youth, supporting youth to navigate the homelessness system, and coordinating services as needed.</p> <p>(b) A system that supports and advocates for/with youth as they navigate through systems (housing, education, child welfare, juvenile justice, mental health, etc.) within the county(ies). This includes establishing and implementing a long-term housing stabilization plan; building or rebuilding a family (biological or chosen; if desired); and community support networks.</p> <p>(c) Flexible funds available to provide youth, including but not limited to those pursuing education (postsecondary, GED, technical school - their chosen education pathway) and/or job training/workforce development with support. Note: find full list of YHDP flexibilities in Appendix D.</p>
Target Population	Youth 24 and under
Project Requirements	<p>Proposed project adheres to the Housing First model.</p> <p>Proposed projects will be targeting geographic areas of need.</p> <p>Proposed projects will have supportive services to meet each resident’s individual needs. This will be provided either through YHDP grant or connection to other services.</p> <p>Proposed projects will assist youth from CE and/or community/agency referrals.</p>
HUD Homeless Categories & HUD CoC Project Type	Category 1, 2, & 4 Supportive Services Only (SSO)
Innovation Opportunities	<p>Ensure quick identification of youth at-risk of or experiencing homelessness that would not generally present through the traditional homeless service entry points. Schools, mainstream service providers (e.g., health care, SNAPs, workforce programs, Head Start), law enforcement, and foster care and juvenile justice systems will work with the system navigator to connect youth to the coordinated entry system and/or prevention/diversion resources.</p> <p>Training in schools for teachers on identifying youth who may be at risk and connection to this resource.</p> <p>Training for law enforcement on youth cultural competency, trauma informed care, and how to identifying youth at risk of homelessness, and connecting to this program or other resources for youth who are at risk.</p>

<b>Permanent Supportive Housing</b>	
Summary	Permanent supportive housing programs provide non-time limited housing assistance and supportive services for youth ages 18-24 with disabilities.

Target Population	Youth age 18-24 with disabilities. Note: youth do not age out at 24.
Project Requirements	Proposed projects adhere to the Housing First model. Proposed projects will offer supportive services to meet each resident's individual needs. This will be provided either through YHDP grant or connection to other services. Proposed projects will be targeting geographic areas of need. Proposed projects will house 100% of youth through Coordinated Entry.
HUD Homeless Categories & HUD CoC Project Type	Category 1, 2 & 4 Permanent Supportive Housing (PSH)
Innovation Opportunities	Housing could be in the youth's own apartment or shared housing.

## ELEMENTS OF HOUSING MODELS

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- Shared housing models: Inclusion of pilot programs for roommate matching, host homes, and peer-led supportive housing that incorporate youth choice that respond to housing market constraints. Renting rooms in underoccupied homes.
- Serving the most vulnerable youth: Prioritized, low-barrier entry for the most vulnerable youth as identified by the coordinated entry system
- Innovative adoption of Housing First principles: This includes the absence of barriers to entry and service participation requirements, and provision of targeted, intensive supports to ensure housing success
- Transition planning: Immediate/ongoing transition planning from entry through placement; may include housing navigation support and links to adult or other ongoing supportive housing
- Innovation in education and employment: Links to demonstrated, flexible, youth-led and -appropriate education and/or employment support
- Youth-centered supportive services/case management: Adoption of principles of flexible, youth-centered supportive services/case management focused on the individualized needs of youth, which may include making connections to schools, caring and trusted adults, health care providers, and youth development organizations.

- Employ Positive Youth Development principles: Use Positive Youth Development to build strengths and promote resiliency and to provide services with a focus on skills-building, leadership, and community involvement.
- Trauma-informed care approach: Staff are trained to provide trauma-informed care, including crisis intervention, conflict resolution, counseling services and specialized services for populations of focus that are responsive to their histories of trauma.
- Foster permanent connections: Provide services for the development and strengthening of ongoing attachments to biological and chosen family and other positive social relationships. Services may include reunification, crisis intervention, or family finding services; mentoring programs; and family engagement services, including counseling, mediation services and parental support center.
- Promote social and community integration: Offer meaningful opportunities for community involvement, engagement and leadership for youth, including access to community-based activities, neighborhood events, and volunteer opportunities.
- Immediate and ongoing access to age-appropriate mental-health treatment: Onsite or mobile supportive services/case management and/or behavioral health treatment and supports, including substance treatment and peer-led supports
- Innovative links to other systems of care: Housing with direct, innovative links from other systems (child welfare, juvenile and adult court, adult probation, educational institutions, healthcare) and targeted services for those subpopulations
  - Targeted subpopulation housing and services: Housing with targeted community and peer supports for identified subpopulations (LGBTQ, CSEC, African American, Latinx, parenting TAY, justice- and foster-involved youth)
  - Innovation in identifying and measuring outcomes: Demonstrated, outcomes-based furtherance of goals and objectives outlined in the community plan
  - Creative service models: Service models that create incentives for client participation by acknowledging and supporting youth needs (for example, employment training programs that compensate youth for time spent at supportive services/case management or mental health appointments as well as for time spent at work)
  - Expansion of housing options and supply: Creative engagement with community residents and landlords and increase youth access to housing through new housing models specifically targeted toward youth needs.

## SUPPORTIVE SERVICES STANDARDS FOR ALL PROJECTS

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### **Overall Job Description and Duties:**

Every Supportive Services Specialist/Housing Support Specialist/Housing Coach/Case Manager should have a written job description detailing their major responsibilities and required/preferred qualifications. Project staff should demonstrate an ability to work with diverse populations, presenting with a wide variety of needs. **Typical supportive services responsibilities, at a minimum, facilitate the following:**

- Development of a **Housing Stability Plan** with households. Plans are highly participant-driven without predetermined goals, and should build on each participant's needs, goals, and strengths. The Housing Stability Plan should be reviewed monthly and revised, at a minimum, every 3 months. More frequent revisions will be needed during times of acute crisis.
- Creative problem solving to help households to self-resolve their housing crisis.
- Linkage to community-based services per the Housing Stability Plan.
- Promote access to and effective utilization of mainstream benefits:
  - Transportation assistance
  - Assistance with enrollment in income and non-income benefits
  - Follow-up at least annually to ensure benefits are received and renewed
  - Ensure access to SSI/SSDI technical assistance
- Engage participants from day one to assess housing barriers, develop housing plans, and link households to the right types of assistance to facilitate movement into permanent housing or maintenance of permanent housing. Projects should involve households in decisions about what they need to end their homelessness. This programming and planning should be respectful, incorporate strengths-based approaches and consumer choice.
- Help households address issues that may impede access to housing (such as credit history, arrears, and legal issues).
- Assist households with finding, moving into and maintaining housing. This may include engaging landlords and working closely with landlords to facilitate participant move-in and ongoing success in housing.
- Make appropriate and time-limited services and supports available to families and individuals to allow them to move quickly to permanent housing and/or retain permanent housing.
- Collect required documentation, per funder requirements.
- Provide or assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals. This includes providing or ensuring that the household has access to resources including childcare, education, employment and job training, financial literacy, health, legal services, public benefits access, substance use recovery, and transportation, among others (if needed and appropriate) so that they can sustain permanent housing upon exit. This includes providing advocacy on behalf of households as needed to access necessary services.
- For scattered site projects: assist with housing location, lease negotiation, determining rent reasonableness, and inspection.
- For SSO, ES, and TH projects: Help households identify and select among various permanent housing options based on their unique needs, preferences, and financial resources.

## **Principles of Supportive Services/Case Management**

- Person-Centered
  - Project staff should practice a person-centered approach that “ensures that the person who has experienced homelessness has a major say in identifying goals and service needs, and that there is shared accountability. The goal of supportive services/case management is to empower people, draw on their strengths and capabilities, and promote an improved quality of life by facilitating timely access to the necessary supports, thus reducing the risk of homelessness and/or enhancing housing stability.”<sup>iii</sup> Services should be client-directed, highly individualized and tailored to participant’s needs, respectful of individuals’ rights to self-determination, and voluntary. Project staff should be trained in person-centered supportive services/case management strategies including Trauma-Informed Care, Motivational Interviewing, Critical Time Intervention and Harm Reduction, among others.
- Housing-Focused
  - Projects should focus on the goal of assisting clients to secure and maintain permanent, stable, affordable housing. For clients not currently in safe, decent, affordable housing, the primary goal is to develop a strategy to assist them in securing housing. For those already housed, the goal is to assure that adequate supportive services are in place so the client can maintain housing.
- Trauma-informed care
  - Trauma-informed care is an organizational structure and framework that involves understanding, recognizing, and responding to the effects of all types of trauma. It emphasizes physical, psychological and emotional safety for both participants and providers, and helps participants rebuild a sense of control and empowerment. Trauma-informed care operates with the following principles:
    - **Consumer empowerment:** Using individuals’ strengths to empower them in the development of their goals;
    - **Choice:** Informing consumers regarding Project and housing options so they can choose the options they prefer;
    - **Collaboration:** Maximizing collaboration among staff, participants and their families in organizational and individual goal planning;
    - **Safety:** Developing healthy home settings and activities that ensure consumers’ physical and emotional safety; and
    - **Trustworthiness:** Creating clear expectations with consumers about what proposed Projects entail, who will provide services, and how supports will be provided.
  - In addition to providing trauma-informed care to clients, the CoC believes it is important that staff receive trauma-informed supervision and support. Staff support under YHDP can be budgeted under supervision.
- Progressive engagement
  - Progressive Engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with minimal financial and support resources. More supports are offered to those households who struggle to stabilize and cannot maintain their housing without assistance.
  - Progressive engagement recognizes that there is no way to accurately predict how much help someone may need to end their homelessness and avoid a return to the

streets or shelter. While we know that many people can successfully exit homelessness and avoid immediately returning with a small amount of assistance, we also know that there are no dependable predictors to guide the amount of assistance needed. In this approach, participants are initially offered “light-touch” assistance, including help creating a reasonable housing placement/stabilization plan, housing information and search assistance, and limited financial assistance (first month’s rent, security deposit, short-term rental assistance). Progressive engagement may involve more frequent contacts during a participants’ early time in the project. All client check ins should include a discussion of the housing stability plan to review progress, barriers and supports needed.

- Projects using Progressive Engagement regularly reassess housing barriers and seek to close cases as soon as housing retention barriers are resolved. Projects should strive to provide the minimum level assistance necessary (i.e., lightest possible touch or just enough) for the shortest time possible to achieve housing stability.
- Housing First (as related to supportive services/case management)
  - Supportive services emphasize housing procurement over therapeutic goals. Participation in services or project compliance is not a condition of staying in the project.
  - Project staff/service coordinators are trained in and actively employ evidence-based practices for client/tenant engagement such as motivational interviewing and client-centered counseling.
  - Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of tenants' lives, where tenants are engaged in non-judgmental communication regarding drug and alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.
  - Refer to “General Standards for All Projects- Housing First and Low-Barrier Access” and “General Standards for All Projects-Termination” in the CoC Written Standards for more detail.

**Frequency** The frequency of supportive services/case management depends on the unique needs and situation of every project participant. Supportive Services Specialist/Housing Support Specialist/Housing Coach/Case Managers should be in direct contact with their clients at least once a month. The frequency of direct contact may increase due to the household’s homeless status, acute needs, and overall lack of housing stability. In-person meetings with clients are preferred. The level of Supportive services/case management support is to match the needs of the household, addressing factors that can negatively impact housing stability. As such, the intensity of supportive services/case management frequency, duration, and support can and will change over time.

Supportive services/case management is always offered to anyone enrolled in programming and is strengths-based, trauma-informed, progressive, culturally competent, and client-centered. It is the client's right to choose their level of involvement, and supportive services/case management is an integral part of establishing stabilization when permitted to be incorporated. Those

receiving Rental Assistance and/or Financial Assistance will always be offered supportive services/case management.

**Location/Timing** Supportive services/case management should occur at whatever location works best for the client. While home-based visits are ideal for persons residing in scattered-site housing, case management can also occur in the office or in the community. Supportive services/case management hours can also be flexed to be able to meet a client before or after "typical" working hours. Supportive Services Specialist/Housing Support Specialist/Housing Coach/Case Managers that are working evenings and weekends can have a different pay scale than staff members working "typical" working hours.

**Caseload** Use the supportive services/case management guidelines that are found [here](#) on the HUD website to identify appropriate staffing levels.

## YHDP FLEXIBILITIES

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YHDP projects may choose to take advantage of the special YHDP activities and other options listed. The following options would not meet CoC program requirements but may be used to carry out YHDP projects and either require notification or approval from the Dept. of Housing and Urban Development Deputy Assistant Secretary.

- YHDP housing projects may have leases for a minimum term of 1 month under rental assistance budget line items.
- YHDP recipients may use project administrative funds to support costs associated with involving youth with lived experience in project implementation, execution, and improvement.
- YHDP recipients may employ youth who are receiving services, including housing, from the recipient organization. Recipients that utilize this special YHDP activity must maintain documentation that discloses the nature of work that the youth does, and that the youth is not in a position that creates a conflict of interest.
- YHDP recipients may provide moving expenses more than one time to a program participant.
- YHDP recipients may provide payments of up to \$500 per month for families that provide housing under a host home and kinship care model in order to offset the increased costs associated with having youth housed in the unit. (If payments in excess of \$500/month are needed and can be justified, a HUD waiver may be granted to cover up to \$1,000.)
- YHDP grant funds may be used for the following if they are necessary to assist program participants to obtain and maintain housing. Recipients and subrecipients must maintain records establishing how it was determined paying the costs was necessary for the

program participant to obtain and retain housing and must also conduct an annual assessment of the needs of the program participants and adjust costs accordingly.

1. Security deposits for units in an amount not to exceed 2 months of rent;
  2. The costs to pay for any damage to housing due to the action of a program participant, which may be paid while the youth continues to reside in the unit. The total costs paid for damage per program participant may not exceed the cost of two months' rent.
  3. The costs of providing household cleaning supplies to clients.
  4. Housing start-up expenses for program participants, including furniture, pots and pans, linens, toiletries, and other household goods, not to exceed \$300 in value per program participant.
  5. Grantees may provide moving expenses more than one time to a participant.
  6. The one-time cost of purchasing a cellular phone and service for program participant use, provided that access to a cellular phone is necessary to obtain or maintain housing and the costs of the phone and services are reasonable per 2 CFR 200.404.
  7. The cost of the internet in a program participant's unit.
  8. Payment of rental arrears consisting of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
  9. Payment of utility arrears of up to 6 months per service.
  10. Up to three months of utilities for a program participant, based on the utility costs schedule for the unit size and location.
  11. In addition to bus/uber/taxi transportation costs, a recipient may pay gas and mileage costs for a program participant's personal vehicle for trips to and from medical care, employment, childcare, or other eligible services.
  12. Legal fees, including court fees, bail bonds, and required courses and equipment.
  13. Program participant's past driving fines and fees that are blocking a young person from being able to obtain or renew a driver's license and impacting their ability to obtain or maintain housing. Additionally, recipients may pay for program participants costs for insurance and registration for personal vehicles, if the personal vehicle is necessary to reach medical care, employment, childcare, or other services eligible under this section.
- A recipient may provide up to 36 months of Rapid Rehousing rental assistance to a program participant if the recipient demonstrates (1) the method it will use to determine which youth need rental assistance beyond 24 months and (2) the services and resources that will be offered to ensure youth are able to sustain their housing at the end of the 36 months of assistance.
  - YHDP recipients may continue providing supportive services to program participants for up to 24 months after the program participant exits homelessness, transitional housing or after the end of housing assistance if the recipient demonstrates: 1) the proposed length of extended services to be provided; 2) the method it will use to determine whether services are still necessary; and 3) how those services will result in self-sufficiency and ensure stable housing for the YHDP program participant.
  - YHDP recipients may continue providing supportive services to program participants for up to 36 months after the program participant exits homelessness, if the services are in



connection with housing assistance, such as the Foster Youth to Independence initiative, or if the recipient can demonstrate that extended supportive services ensures continuity of case workers for program participants.

**APPENDIX I: TIPS AND GUIDANCE FOR ENGAGING PERSONS WITH LIVED EXPERIENCE IN HOMELESS ASSISTANCE PROJECTS**

## **Tips and Guidance for Engaging Persons with Lived Experience in CoC-Funded, ESG-Funded, and all other homeless service provider agencies**

### **Overview:**

In addition to the guidance within the Written Standards around requirements for CoC- and ESG-funded projects to incorporate the expertise of persons with lived experience (PWLE), the CoC's Homeless Action Board (HAB) has the following guidance on meaningful engagement of PWLE within programs:

Recipients and sub-recipients should maximize PWLE involvement in project design, delivery, and governance by:

- Creating concrete strategies to include PWLE input in project design and delivery
- Taking actions, based on input from PWLE, that will result in measurable impacts on operations or programming

### **Goals of incorporating the expertise of PWLE include:**

- Community-wide operational expectations, that incorporate the experiences of those who have participated in programs
- More equitable and transparent processes
- Advancement of CoC system-wide goals
- Alignment with HUD standards

### **Engagement Methods/How to Incorporate the Voices of PWLE:**

- CoC and ESG providers: Talk to current and former participants about opportunities to be involved and give input on project design and delivery, such as joining an advisory board or participating in focus groups.
- Joining Boards or Committees within the organization: Offering clear roles and expectations for participation, along with decision-making power.
- Focus groups: Gathering diverse input from past/present program participants
- Surveys: Gather input from past/present program participants and utilize feedback to make responsive changes to programming.
- Report back: If a change was implemented because of PWLE feedback, reach out and tell them about their impact!

### **Substantive Actions/Implementation:**

- Offer appropriate training to ensure PWLE can meaningfully engage
- Utilize information gathered from PWLE to implement meaningful change to their programs
- Allocate resources to support PWLE engagement. Compensate PWLE for their time (such as serving on Boards/Committees) whenever possible
- Hire and support PWLE at all organizational levels with training and advancement opportunities
- Tell PWLE how you are using the information, and how their voice impacts change!