



WRITTEN STANDARDS

**FOR THE PA-509 EASTERN PENNSYLVANIA CONTINUUM OF
CARE**

**Approved by the PA-509 Eastern Pennsylvania Continuum of Care Governing
Board on 2/18/26**

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INTRODUCTION AND BACKGROUND

This document contains written standards for organizations delivering housing and services to people experiencing or at risk for homelessness in a region of Pennsylvania defined by the United States Department of Housing and Urban Development (HUD) as the PA-509 Eastern Pennsylvania Continuum of Care. The purpose of the Written Standards is to:

- Establish community-wide expectations for the operations of projects within the CoC's geography,
- 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

Compliance with these standards is required for all programs funded by HUD, which includes both CoC grants and ESG grants administered on behalf of HUD by the Pennsylvania Department of Community and Economic Development (PA DCED) and direct entitlement communities operating within the Eastern PA Continuum of Care service area. Adherence to and successful implementation of these written standards is built into both project monitoring for ESG and CoC and the project evaluation and ranking process for annual CoC Program competitions. **The use of these standards is also strongly encouraged for all homeless assistance**

programs within the Eastern PA CoC geography to ensure an effective and coordinated systemic response to homelessness that is based on best practices in the sector and provides a uniform and equitable experience for all families and individuals experiencing homelessness or a housing crisis in every community.

As a network of service providers, funders, advocates, program participants, people with lived experience, and community partners, the Eastern PA Continuum of Care has a mission to end and prevent homelessness. The Eastern PA

Continuum of Care is comprised of the following counties in Eastern Pennsylvania: Adams, Bedford, Blair, Bradford, Cambria, Carbon, Centre, Clinton, Columbia, Cumberland, Franklin, Fulton, Huntingdon, Juniata, Lebanon, Lehigh, Lycoming, Mifflin, Monroe, Montour, Northampton, Northumberland, Perry, Pike, Schuylkill, Somerset, Snyder, Sullivan, Susquehanna, Tioga, Union, Wayne, and Wyoming.



Collectively, these 33 counties span nearly 21,000 square miles and include 11 cities, 672 townships and 337 boroughs. To learn more about the Eastern PA Continuum of Care, please visit the CoC website¹.

¹ <https://pennsylvaniacoc.org/easterncoc>

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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

Projects are expected to adhere to all additional Project requirements within the HUD regulations (24 CFR Part 578² for CoC funded and 24 CFR Part 576³ for ESG funded), as well as new requirements mandated by HUD and the Eastern 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.

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
- IPV – Intimate Partner Violence
- NOFO – Notice of Funding Opportunity
- OPH – Other Permanent Housing
- PA-509 – HUD code for the Eastern PA CoC
- PIT – Point in Time Count
- PSH – Permanent Supportive Housing
- PWLE – People with Lived Experience/Expertise

² <https://www.law.cornell.edu/cfr/text/24/part-578>

³ <https://www.law.cornell.edu/cfr/text/24/part-576>

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- 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 application⁴ 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 and/or the application process for their entitlement community.

CONFLICT OF INTEREST CoC-funded projects must follow 24 CFR 578.95⁵ related to conflicts of interest. ESG projects are expected to follow the conflict of interest standards outlined in 24 CFR 576.404⁶ related to the provision of ESG assistance, and procurement of goods and services.

COORDINATED ENTRY (CE) PARTICIPATION

Households must be enrolled in Coordinated Entry to access any HUD-funded services and housing in the Eastern PA CoC service region, including:

- Street Outreach (if the household was living unsheltered or in a place not meant for human habitation the previous evening and not already engaged with Street Outreach).
- Emergency Shelter (if the household was living unsheltered or in a place not meant for human habitation the previous evening).*
- Rapid Re-Housing (if the household meets the HUD Category 1 or 4 definitions of homelessness).
- Permanent Supportive Housing (if the household meets the HUD Category 1 or 4 definitions of homelessness).

⁴ As of 2024, HUD announced an intent to move to biennial (every 2 year) CoC Notice of Funding Opportunity (NOFO). CoC grantees should follow instructions from the CoC related to the submission of renewal applications as part of the CoC NOFO process.

⁵ <https://www.law.cornell.edu/cfr/text/24/578.95>

⁶ <https://www.law.cornell.edu/cfr/text/24/576.404>

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- Homelessness Prevention (if the household meets the HUD Category 2 definition of imminent risk of homelessness).

*Unsheltered households may be enrolled in an Emergency Shelter for up to 2 business days before receiving a Coordinated Entry intake to focus on crisis stabilization and/or if Coordinated Entry services are not available at the time of enrollment (i.e., on an evening, weekend, or federal holiday).

Coordinated Entry Specialists make direct referrals to crisis services, including Emergency Shelter, Street Outreach, Homelessness Prevention, and Transitional Housing. During Coordinated Entry intake, CE Specialists use a Housing Assessment Tool (HAT) designed locally by the CoC to prioritize housing for the most vulnerable individuals. Coordinated Entry Regional Managers manage the By Name List through Case Conferencing and send/“push” referrals for Rapid Re-Housing and Permanent Supportive Housing to providers in their respective geographic regions.

CoC- and ESG-funded permanent housing projects (Rapid Rehousing and Permanent Supportive Housing) must participate in CE 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. CoC-participating housing providers are expected to have at least one (1) staff member attend By Name List case conferencing meetings within the region they serve; and
- Inform the Coordinated Entry Regional Manager of any openings within their program; and
- Follow the CoC’s Order of Priority; and
- Record the Result Date and Referral Outcome for every Push BNL Referral from Coordinated Entry Regional Managers. An initial Result Date and Referral Outcome must be recorded within two (2) business days of receiving the referral from Coordinated Entry. The Result Date and Referral Outcome should be updated and saved whenever they change afterward.

ESG-funded emergency shelter providers must participate in CE in the following ways:

- Emergency Shelter case managers cannot enroll a household into any HUD ESG or CoC-funded project unless/until the household has received an appropriate Coordinated Entry intake from an official Eastern PA Continuum of Care Call Center or Access Site CE Specialist.
 - The only exception to this rule is that unsheltered households may be enrolled in an Emergency Shelter for up to 2 business days before receiving a Coordinated Entry intake to focus on crisis stabilization and/or if Coordinated Entry services are not available at the time of enrollment (i.e., on an evening, weekend, or federal holiday).
- When informing a household that they need to contact Coordinated Entry for a CE intake, assessment, and referral, Emergency Shelter staff should tell the person that they need to call 211 (or visit an Access Site) for a screening.
- Emergency Shelters that are not HUD-funded are also encouraged to use this guidance to ensure the CoC has a coordinated approach to serving households in crisis and accurate data on the number of people experiencing unsheltered homelessness in the region.

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Full CE Policy and Procedures can be found on the CoC website⁷.

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

CO C PARTICIPATION All CoC recipients are required to participate in CoC-wide meetings, RHAB meetings and required CoC trainings. The CoC will notify grantees of trainings via CoC mailing list and will indicate which trainings are required vs. optional. CoC-funded programs are also encouraged to 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.

ENVIRONMENTAL REVIEW CoC- and ESG-funded projects (unless exempt) are required to complete an environmental review per 24 CFR 578.31⁸. Projects that are exempt from environmental review requirements include: tenant-based rental assistance, tenant-based leasing, supportive services, and administrative costs, including leasing office or emergency shelter space. More details on environmental review requirements can be found in HUD's CoC and ESG Virtual Binder⁹.

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

⁷ <https://pennsylvaniacoc.org/balance-stateeastern-pa-coc/connect-home-coordinated-entry-system-eastern-pa>

⁸ <https://www.law.cornell.edu/cfr/text/24/578.31>

⁹ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-environmental-review/coc-and-esg-environmental-review-overview/>

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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)¹⁰ for CoC-funded and 24 CFR 576.406¹¹ for ESG funded]

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 complies with federal laws and guidance. Each project must also address their state, local and municipality requirements regarding fair housing rules and regulation.

Projects must follow federal laws and guidance as outlined below, which are in effect as of the publishing of the Written Standards:

- **Fair Housing and Equal Opportunity laws-** In accordance with 24 CFR 578.93¹², projects must follow nondiscrimination and equal opportunity requirements as well as those requirements set forth in 24 CFR 5.105(a)¹³ and the Fair Housing Act¹⁴.
- **Equal Access to Housing Final Rule (2012)**¹⁵
- **Equal Access in Accordance with Gender Identity Final Rule (2016)**¹⁶
- **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.
- **Accessibility and integrative housing and services for people with disabilities.** Recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR 100¹⁷), Section 504 of the Rehabilitation Act of 1973 (24 CFR 8¹⁸), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR 35¹⁹ and 36²⁰). In accordance with the requirements of 24 CFR 8.4(d)²¹, 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.

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

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

¹² <https://www.law.cornell.edu/cfr/text/24/578.93>

¹³ <https://www.law.cornell.edu/cfr/text/24/5.105>

¹⁴ <https://www.justice.gov/crt/fair-housing-act-1>

¹⁵ <https://www.federalregister.gov/documents/2012/02/03/2012-2343/equal-access-to-housing-in-hud-programs-regardless-of-sexual-orientation-or-gender-identity>

¹⁶ <https://www.federalregister.gov/documents/2016/09/21/2016-22589/equal-access-in-accordance-with-an-individuals-gender-identity-in-community-planning-and-development>

¹⁷ <https://www.law.cornell.edu/cfr/text/24/part-100>

¹⁸ <https://www.law.cornell.edu/cfr/text/24/part-8>

¹⁹ <https://www.law.cornell.edu/cfr/text/28/part-35>

²⁰ <https://www.law.cornell.edu/cfr/text/28/part-36>

²¹ <https://www.law.cornell.edu/cfr/text/24/8.4>

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- **Reasonable Accommodations and Modifications for Persons with Disabilities²²**. 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.
 - 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.
- **Assistance, Emotional Support, and Service Animals**
 - The Fair Housing Act²³ makes it unlawful for a housing provider to refuse to make a reasonable accommodation that a person with a disability may need in order to have equal opportunity to enjoy and use a dwelling. HUD released Notice FHEO-2020-0124, the Assistance Animals Notice, to clarify the rights and obligations under the FHA regarding assistance animals. This notice explains certain obligations of housing providers under the FHA with respect to animals that individuals with disabilities may request as reasonable accommodations.
 - An assistance animal is an animal that works, provides assistance, or performs tasks for the benefit of a person with a disability, or that provides emotional support that alleviates one or more identified effects of a person's disability. An assistance animal is not a pet. There are two types of assistance animals: (1) service animals, and (2) other

²² 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/>

²³ <https://www.justice.gov/crt/fair-housing-act-1>

²⁴ <https://www.hud.gov/sites/dfiles/PA/documents/HUDAsstAnimalNC1-28-2020.pdf>

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trained or untrained animals that do work, perform tasks, provide assistance, and/or provide therapeutic emotional support for individuals with disabilities (referred to in this guidance as a “support animal”). Persons with disabilities may request a reasonable accommodation for service animals and other types of assistance animals, including support animals, under the FHA. This guidance provides housing providers with a set of best practices for complying with the FHA when assessing requests for reasonable accommodations to keep animals in housing, including the information that a housing provider may need to know from a health care professional about an individual’s need for an assistance animal in housing.

- All Eastern PA Continuum of Care member organizations must have a policy on assistance animals that is applied consistently and transparently. For more information on developing or updating an animal assistance policy, please reference Notice FHEO-2020-01²⁵.
- **Guidance for Creation of Nondiscrimination and Fair Housing Policies.** All provider agencies should have their own nondiscrimination and fair housing policies. This includes:
 - Policies which ensure the agency does not tolerate discrimination and complies with all nondiscrimination, fair housing, and equal opportunity laws.
 - 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, agencies should have 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.

HMIS PARTICIPATION AND DATA QUALITY 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.

CoC and ESG-funded projects must complete, at a minimum, an entry assessment, annual assessment, and exit assessment for all clients enrolled in the project. Permanent housing projects (PSH, RRH, OPH) must also enter a housing move-in date in HMIS. Only clients who have been enrolled in a project for one year or more are required to have an annual assessment. Annual assessments are due within a 60-day window of the client’s enrollment anniversary date (30 days before to 30 days after their enrollment anniversary date). Missing assessment data at entry, annual, or exit has a significant impact on the project’s performance outcomes, as well as the overall outcomes of the CoC. As such, CoC and ESG grantees must maintain high data quality and completeness within HMIS (or for Victim Service Providers – within their comparable database). The HMIS Lead Agency and CoC Lead will monitor data quality for CoC and ESG-funded projects, as well as for other projects participating in HMIS.

Income must be documented in HMIS (at entry, annual and exit) for the Head of Household and any other adult household members. Income received by or on behalf of a minor child must be recorded as

²⁵ <https://www.hud.gov/sites/dfiles/PA/documents/HUDAsstAnimalNC1-28-2020.pdf>

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part of household income under the Head of Household. Income must be recorded at the participant-level for heads of household and adult household members.

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”).

Project start date in HMIS is based on project type²⁶:

- 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;
 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.

Project exit date in HMIS is based on project type:

- **For site-based residential projects and Entry-Exit emergency shelters**, this date represents the last day of a continuous stay in the project before the client transfers to another residential project or otherwise stops residing in the project. For example, if a person checked into an overnight shelter on January 30, 2023, stayed overnight, and left in the morning, the exit date for that shelter stay would be January 31, 2023.
- **Tenant-based permanent housing projects:** The last day the client receives rental assistance or supportive services (RRH) or is provided rental assistance (tenant-based PSH, transition-in-place)
 - **Clients in RRH projects are to be exited after the last RRH service is provided.** If eligible RRH case management services are provided past the final date of receiving rental assistance, for example, the client must not be exited until those services cease.
- **For Night-by-Night emergency shelters**, the exit date should be the day after the last recorded bed night.
- **For non-residential projects, the exit date must represent the last day a contact was made, or a service was provided.** The exit date should coincide with the date the client is no longer considered a participant in the project.
 - In a street outreach project, clients may be exited when the outreach staff has been unable to locate the client for an extended period of time and there are no recorded

²⁶ <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.pdf>

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contacts. The CoC must be involved in the determination of what constitutes an "extended length of time", and to which projects the solution is to be applied.

- In addition, the client may be exited upon entering another project type, finding housing, engaging with another outreach project, or passing away. In those cases, the client would be exited

In addition to any Written Standards in this document for PA HMIS participating organizations, all PA HMIS participating organizations must also comply with the most recent HUD HMIS Data Standards²⁷ Manual and PA HMIS Governance Charter. More information on PA HMIS requirements can be found here on the CoC website²⁸.

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.
- 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.). 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.

HOUSING RETENTION BEST PRACTICES AND EXPEDITED HOUSING ACCESS CoC- and ESG-funded permanent housing programs provide permanent housing as quickly as possible with few to no preconditions, behavioral contingencies, or barriers. Effectively implementing a case management approach that prioritizes housing retention involves prioritizing people with the highest needs and vulnerabilities, engaging 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 retention best practices 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.

²⁷ <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

²⁸ <https://pennsylvaniacoc.org/homeless-management-information-system/about-hmis>

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- 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.
- Participation in services or compliance with service plans are not conditions of tenancy but are reviewed with tenants and regularly offered as a resource to tenants.
- ESG-funded Rapid Re-housing (RRH) and Homelessness Prevention (HP) projects and CoC-funded RRH projects must require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability.
 - The purpose of any case management should be to engage the program participant. Additionally, a program participant should not be evicted from, or terminated from, the program for failure to meet with the case manager.²⁹
- Leases or occupancy agreements cannot have stipulations that would not be found outside of a standard rental agreement.
- Services are informed by a philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants' lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices. Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- Case managers/service coordinators are trained in and actively employ evidence-based practices for participant engagement such as motivational interviewing and person-centered counseling.
- Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.
- Every effort is made to provide a tenant with the opportunity to transfer from one housing situation, program, or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

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 provided³⁰.
 - 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.

²⁹ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/service-requirements/case-management/>

³⁰ [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))

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- 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.
- ESG-funded projects must follow 24 CFR 576.405³¹. 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 AND HOUSING STANDARDS All units paid for with CoC leasing or rental assistance funds must meet certain basic Housing Quality Standards (HQS) prior to expending CoC funds on that unit. All units must additionally meet state and local codes.³²³³

- The recipient or subrecipient must physically inspect all units prior to expending CoC funds and must continue to do so annually throughout the grant period. The annual review can take place during lease renewal.
- Inspectors do not need to be certified.
- The owner of the unit has 30 days to address and correct any deficiencies in the unit.
- The recipient or subrecipient must maintain documentation of compliance with HQS, including inspection reports.

CoC recipients and subrecipients are expected to screen for, disclose the existence of and take reasonable precautions regarding the presence of lead-based paint in leased or assisted units constructed prior to 1978.³⁴

³¹ <https://www.law.cornell.edu/cfr/text/24/576.405>

³² <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-leasing-rental-assistance-requirements/codes-and-standards/>

³³ As of the writing of these standards, HUD has indicated an intent to change ESG and CoC inspection requirements to follow NSPIRE Standards, beginning in 2026. The CoC will provide guidance on this as it becomes available.

³⁴ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-leasing-rental-assistance-requirements/codes-and-standards/>

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ESG establishes minimum standards for safety, sanitation, and privacy in emergency shelters funded with ESG, and minimum habitability standards for permanent housing funded under the Rapid Re-housing and Homelessness Prevention components of ESG. Additional details can be found in HUD's virtual binders³⁵.

MAINSTREAM BENEFITS: All projects must promote access to and effective utilization of 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 578.73³⁶ Matching requirements. ESG-funded projects should refer to the application and regulations associated with their contract year and as outlined in 24 CFR 576.01.³⁷

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.

³⁵ <https://files.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards.pdf>

³⁶ <https://www.law.cornell.edu/cfr/text/24/578.73>

³⁷ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-576/subpart-C/section-576.201>

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- 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.

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, 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 Per 24 CFR 576.402³⁸, a program will terminate a participant only in rare circumstances to ensure the safety of participants or comply with regulations, laws, or a signed lease agreement.

Projects must have a formal termination of assistance and grievance policy that must be given to all program participants before receiving services that include a list of the participant's rights and responsibilities and a description of the termination of assistance process. These policies should be guided by the following principles:

- Eviction by a landlord in a scattered site project should not automatically 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 retention-focused 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.
- Termination does not prohibit the program from providing additional assistance to the participant in the future nor prohibit the participant from receiving assistance from another project.

³⁸ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-576/subpart-E/section-576.402>

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- Termination should not result in a return to homelessness. Projects should ensure the participant does not return to literal homelessness through an assisted rapid resolution conversation and/or providing connections to Connect to Home CES and other community services.
- When exiting a household, case managers/project staff:
 - Are responsible for ensuring that all appropriate referrals have been made and information on available community assistance has been agreed to by the participant;
 - Provide a “warm handoff” to any ongoing supports and follow up to assure that those supports are satisfactory; and,
 - Provide information to participants about how they can access assistance from the program again if needed and what kind of follow-up assistance may be available.
- In scattered-site projects, households should **not** be automatically terminated from the project (during the pre-move in phase) for failure to locate a rental unit within a specified amount of time. Housing providers are expected to provide support to participants with the housing search process. Participants are also expected to actively engage in the housing search process and engage with their assigned staff during this time to locate a unit. As some clients may need more support with this process, and some communities have very little housing stock that meet HUD’s guidelines, providers are encouraged to provide both flexibility and support to participants to find a unit.
 - 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. Housing 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.
 - Some households may need 30, 60, or 90 days to locate a unit, and in some extenuating circumstances may need more than 90 days. Providers should evaluate on a case-by-case basis how long households may remain enrolled in the pre-move in phase. If participants are actively engaged in the housing search process, providers are encouraged to provide flexibility on the length of time for housing search.
 - *More detail on expectations for project staff around housing location is provided in the RRH and PSH sections of the Written Standards.*

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

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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.

Termination of assistance procedures:

- 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.
- To terminate rental assistance or housing relocation/ 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. The participant's file must document in writing any attempts (e.g., phone, mail, home visit, etc.) to contact the individual in order to discuss the pending termination;
 - Provide the participant with an opportunity to provide their objection in the form of a written or verbal grievance. If the grievance is presented verbally (in-person, over the phone, etc.), the program must document a summary of the grievance;
 - Document in writing the outcome of the termination after the grievance process is completed and signed by the appropriate case manager or supervisor and kept in the client's file; and,
 - Prompt written notice of the final decision to the Project participant.

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 E)**.
 - In accordance with the VAWA, Eastern 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.

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- 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.
- Please see **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, or Stalking (Appendix E)** 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**
 - For participants who need to transfer between projects within the same project model (PSH to PSH or RRH to RRH), providers must follow the **CoC's Transfer Policy (Appendix D)**.
- **Transfers from one project model to another (RRH to PSH)**
 - For participants who need to transfer from one project model to another (RRH to PSH) providers must follow the **CoC's Transfer Policy (Appendix D)**.

VIOLENCE AGAINST WOMEN ACT (VAWA)

- Background: The Violence Against Women Act (VAWA), reauthorized in 2022³⁹, 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 Forms⁴⁰: Eastern 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 website⁴¹ 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

³⁹ <https://www.hud.gov/vawa#close>

⁴⁰ <https://www.hud.gov/vawa#VAWA-Forms>

⁴¹ <https://www.hud.gov/vawa#VAWA-Forms>

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- (4) When a household is notified their housing assistance is ending / being terminated.
 - Form HUD-5380 Notice of Occupancy Rights under VAWA⁴²: informs households of their VAWA housing protections.
 - Form 5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation⁴³: 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 Stalking⁴⁴: 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").
- **An overview of VAWA Requirements and Cover Sheets for HUD-5380, HUD-5382, and HUD-5383 can be found in Appendix F.** These 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.

⁴² <https://www.hud.gov/sites/dfiles/OCHCO/documents/5380.pdf>

⁴³ <https://www.hud.gov/sites/dfiles/OCHCO/documents/5382.pdf>

⁴⁴ <https://www.hud.gov/sites/dfiles/OCHCO/documents/5383.pdf>

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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 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 Requirements⁴⁵.
- CoC requirements provided in 24 CFR 578.103 Recordkeeping Requirements⁴⁶.

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.

⁴⁵ <https://www.law.cornell.edu/cfr/text/24/576.500>

⁴⁶ <https://www.law.cornell.edu/cfr/text/24/578.103>

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GENERAL ELIGIBILITY All Projects must evaluate and document individuals' and family's eligibility per the HEARTH Homeless Definition Final Rule⁴⁷. 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/housing stability plans

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 G)**. 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 Both CoC and ESG program grant recipients must maintain and follow written intake procedures to ensure compliance with the homeless definition in § 576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The priority for obtaining evidence, in order of preference, is as follows:

- Third-party documentation (**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.

Important Note related to documentation for CoC-Funded providers serving youth age 24 and under: Per the FY24/25 CoC NOFO: "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 or section 103(b) of the McKinney-Vento Homeless Assistance Act as a condition for receiving services funded under this NOFO."

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

⁴⁷ <https://www.govinfo.gov/content/pkg/FR-2011-12-05/pdf/2011-30942.pdf>

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- 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 5.609⁴⁸. Annual income is defined as all amounts, monetary or not, which:

- 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
- 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:

⁴⁸ <https://www.law.cornell.edu/cfr/text/24/5.609>

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- 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 noted 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 of the termination decision; and
- Prompt written notice of the final decision to the project participant.

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 should be 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.
- 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

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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.
- Case managers must make referrals to appropriate community and mainstream resources based on the household's needs and preferences, including, but not limited to income supplements/benefits such as Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and Medicaid; services to meet their unique needs such as those specific to youth, veterans, DV survivors, etc.; legal assistance; credit counseling; mediation; medical care; mental health care; transportation; and subsidized childcare. A case manager's role may include providing advocacy on behalf of households as needed to access necessary services. When making these referrals, it is the case manager's responsibility to follow-up on receipt of assistance. However, a participant may choose not to follow up on or participate in any referred services or programs.
- Participants served by homeless assistance programs may be experiencing substance use disorders (SUDs), mental health needs, and/or trauma. Case managers must prioritize connecting people with appropriate recovery, inpatient, or outpatient mental health services and work closely with any clinicians/case managers to coordinate care. Referrals should be made based on client choice. A participant may choose not to follow up on or participate in any referred services or programs.
- 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
- 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.

Case managers must be trained in person-centered case management strategies including Assisted Rapid Resolution/Diversion, Progressive Engagement, Trauma-Informed Care, Motivational Interviewing, Critical Time Intervention and Harm Reduction, among others.

EASTERN PA CONTINUUM OF CARE WRITTEN STANDARDS

PRINCIPLES OF CASE MANAGEMENT

- Person-Centered
 - Case managers must practice a person-centered approach which 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.
- 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.
 - Case managers must work with program 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 program assistance, including either goals to increase income, reduce debt and/or decrease household expenses. The plan must be monitored and updated at and updated as clients make progress towards their goals. At minimum, updates to the housing stability plan must occur every three months. A copy of the current plan must be given to the participant and kept in their file.
- 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.
- 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.

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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 of assistance necessary (i.e., lightest possible touch or just enough) for the shortest time possible to achieve housing stability.
- Housing Retention Best Practices (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.
 - Refer to “General Standards for All Projects- Housing Retention Best Practices and Low-Barrier Access” and “General Standards for All Projects-Termination” 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.⁴⁹ The frequency of case management services depends on the unique needs and situation of every program participant. The frequency of direct contact may increase due to the household’s homeless status, acute needs, and overall lack of housing stability. 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.

⁴⁹ 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”).

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LOCATION/TIMING Case management should occur at whatever location works best for the participants. In-person meetings with clients are preferred when safe to do so and at a location of the client's choosing. 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.

STANDARDS BY PROJECT TYPE

PERMANENT SUPPORTIVE HOUSING (PSH)

Permanent Supportive Housing (PSH) is permanent housing paired with supportive services to assist individuals experiencing homelessness with a disability or families with an adult or child member with a disability achieve housing stability and live independently. Permanent Supportive Housing programs may be site-based or scattered site.

As its name implies, the core components of Permanent Supportive Housing include:

- *Permanent*: Tenants may live in their homes as long as they meet the basic obligations of tenancy, such as paying rent. 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.
- *Supportive*: Tenants have access to the support services that they need and want to retain housing; and,
- *Housing*: Tenants have a private and secure place to make their home, just like other members of the community, with the same rights and responsibilities.⁵⁰

Access

All households access CoC-funded PSH Projects via Coordinated Entry referral and should be offered the option with as few barriers to project entry as possible.

Case managers cannot enroll a household into a CoC-funded PSH project unless/until the household has been referred by a Coordinated Entry Regional Manager from the By Name List (BNL).

⁵⁰ <https://store.samhsa.gov/product/Permanent-Supportive-Housing-Evidence-Based-Practices-EBP-KIT/SMA10-4509>

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Eligibility

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

- a) Category 1 literally homeless including those in emergency shelter or living in a place not meant for human habitation, OR
- b) Category 4 (fleeing/attempting to flee domestic violence)

Additional details on eligibility per the CoC Coordinated Entry Policies: To be eligible for PSH, a household's current living situation (on the night before contacting Coordinated Entry) must be one of the following:

- Living and sleeping outside or in places not meant for human habitation
- Fleeing or attempting to flee domestic violence or human trafficking
- Staying in an emergency shelter
- Staying in a hotel or motel paid for by a charitable organization or government program or,
- Exiting an institution (ex. jail, prison, a psychiatric hospital, medical hospital, or drug/alcohol treatment program) after staying there for no more than 90 days and having been literally homeless before entering that institution.

Per the CoC's Coordinated Entry policies, households residing in transitional housing are not eligible for PSH.

"Domestic Violence" includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).⁵¹

At least one member of the household must have a qualifying disabling condition to be eligible for PSH. A disabling condition is physical, mental, or emotional impairment that is expected to be long-continuing or indefinite, substantially impedes the ability to live independently, and could be improved by more suitable housing.

Currently, all Eastern PA Continuum of Care PSH projects are 100% dedicated to serving chronically homeless households. This means that PSH resources 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 or who wish to reside in a particular geography, the vacancy can then be offered to a non-chronically homeless household who meets the other criteria for PSH as noted above.

The definition of chronically homeless is:

- A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
 - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and

⁵¹ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-4/>

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- Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.
- An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility; or
- A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless⁵².

More information from HUD on chronic homelessness can be found here in HUD's CoC virtual binders.⁵³

Important Note Regarding Participant Eligibility for CoC-Funded Youth-Serving Providers: Per the FY24/FY25 CoC NOFO, "any youth-serving provider funded under this NOFO may serve unaccompanied youth aged 24 and under or families headed by youth aged 24 and under *who are living in unsafe situations*. HUD interprets "youth-serving provider" as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets "living in unsafe situations" as having an unsafe primary nighttime residence and no safe alternative to that residence."

Prioritization

Eastern PA Continuum of Care PSH service providers must prioritize the enrollment of households who:

- Have been referred to the program by a Coordinated Entry Regional Manager through a combination of viewing the Housing Assessment Tool score, the longest length of time homelessness, chronic homelessness, disabling condition, and severity of needs.
- Based on the referrals received, the provider will then determine eligibility for the program.

As noted in the eligibility section above, all PSH vacancies are prioritized for households who are chronically homeless. If there are no chronically homeless households interested in the PSH vacancy or who wish to reside in a particular geography, the vacancy can then be offered to a non-chronically homeless household who meets the other eligibility criteria for PSH.

Documentation

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

⁵² <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/>

⁵³ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/>

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- Each project participants must have **Documentation of Homelessness (See Templates for CoC and ESG related programs Supplemental Resource)** - see **Templates for CoC and ESG related programs Supplemental Resource**.
- Each potential Project participant must have **Documentation of Disability** - see **Templates for CoC and ESG related programs Supplemental Resource**.
 - An individual or head of household's qualifying disability must be documented by one of the following:
 - Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently;
 - Written verification from the Social Security Administration;
 - The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation);
 - Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence above; or
 - Other documentation approved by HUD.
 - Further, acceptable evidence of a disability for an individual with HIV/AIDS would include written verification from a professional licensed by the state to diagnose and treat HIV/AIDS. There would not be an expectation that the licensed professional would also certify that the condition is expected to be of long-continuing or indefinite duration and substantially impede the individual's ability to live independently.
- 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 16-11⁵⁴ 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.
 - Program procedures must establish the order of priority for obtaining evidence of chronic homelessness as third-party documentation first, intake worker observations second, and certification from the individual seeking assistance third.⁵⁵
 - HUD has also published a sample checklist⁵⁶ that provides an optional way to help record Chronic Homelessness for those projects that need documentation of Chronic Homelessness. This sample checklist would not be needed in projects where this requirement is not in place (like an Emergency Shelter). This tool is a sample, is not required by HUD, and has been provided in an editable format so service providers may edit it and add to their current forms, if they wish.
 - If there no chronically homeless households identified for a PSH vacancy, and the PSH program fills a vacancy with a non-chronic household (per the eligibility and prioritization sections above), this should be documented in the client's case file.

⁵⁴ <https://www.hud.gov/sites/documents/16-11cpdn.pdf>

⁵⁵ <https://www.govinfo.gov/content/pkg/FR-2015-12-04/pdf/2015-30473.pdf>

⁵⁶ <https://files.hudexchange.info/resources/documents/Sample-Chronic-Homelessness-Documentation-Form-2016.docx>

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- PSH projects should follow the detailed guidance on recordkeeping related to documenting chronic homelessness can be found in the HUD CoC Virtual Binder⁵⁷.
- 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.
- 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.⁵⁸
- 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 Addendum⁵⁹
 - The initial lease term must be for at least a year, and terminable only for cause.
- Other documents required in all case files:
 - Passed Inspection (Housing Quality Standards). The passed inspection must be dated BEFORE the lease.
 - **Housing Plans (see Templates for CoC and ESG related programs Supplemental Resource)** are required. PSH 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.
- Case managers are required to submit a BNL Exit Request Form whenever an enrolled household moves into a unit (while still enrolled) or exits the program (successfully or

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

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

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

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otherwise) within 2 business days of the move-in date or program exit date so that Regional Managers can exit the Coordinated Entry Enrollment.

- Case managers must record the date a client or household physically moves into a unit after being enrolled in a Permanent Housing project into PA HMIS within 2 business days of the move-in date.

Duration and Amounts

PSH is designed as a long-term resource for households who will need intensive, long-term support to end their homelessness. There is no time limit for participants.

Each PSH 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. ***The decision to move on from PSH to another resource is based on client choice and cannot be mandated by the program.*** To support households transitioning from PSH, project staff are encouraged to assist 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 used, 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 (adjustment factors include the number of people in the family, age of family members, medical expenses, and childcare expenses)(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.

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:

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- Case managers must use HUD's CoC Program Leasing Rent Determination Worksheet⁶⁰ or CoC Program Rental Assistance Rent Determination Worksheet⁶¹ to determine whether or not a prospective unit's rent meets Fair Market Rent (FMR) and Rent Reasonableness standards. Leasing projects are limited to FMR. Rental assistance projects utilize rent reasonableness. The tools will also help case managers to determine how much rent they can pay with CoC Program funds. CoC Program recipients must use the tool that corresponds with the type of CoC Program funding they receive.
- Case managers must determine Fair Market Rent (FMR) by using HUD's online database⁶². HUD annually estimates FMRs for Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas, and each nonmetropolitan county.
- For projects in which some or all of the costs of utilities are the responsibility of the program participant, case managers must utilize HUD Notice CPD-17-11: Determining a Program Participant's Rent Contribution, Occupancy Charge or Utility Reimbursement in the Continuum of Care (CoC) Program when the Program Participant is Responsible for the Utilities⁶³. This Notice clarifies HUD's expectation that recipients and subrecipients will consider reasonable monthly utility costs when calculating rent contributions or occupancy charges for program participants who are responsible for paying their own utilities. For the purpose of this notice, "utilities" exclude telephone but include gas, oil, electric, sewage, water, and trash removal.
- Programs that sublease to participants must strive to enter into three-way lease agreements with landlords that do not preclude subleasing based on criminal history or substance use.
- For scattered-site PSH projects: Projects should engage in landlord engagement, including identifying available units, facilitating move-in, and ensuring participants' ongoing success in housing. 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 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:

⁶⁰ <https://www.hudexchange.info/resources/documents/CoC-Program-Leasing-Rent-Determination-Worksheet.xlsm>

⁶¹ <https://www.hudexchange.info/resources/documents/CoC-Program-Rental-Assistance-Rent-Determination-Worksheet.xlsm>

⁶² <https://www.huduser.gov/portal/datasets/fmr.html>

⁶³ <https://www.hudexchange.info/resource/5630/notice-cpd-17-11-determining-program-participant-rent-contribution-in-the-coc-program/>

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- 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.
- 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.
- In scattered-site projects, households should **not** be automatically terminated from the project (during the pre-move in phase) for failure to locate a rental unit within a specified amount of time. Housing providers are expected to provide support to participants with the housing search process. Participants are also expected to actively engage in the housing search process and engage with their assigned staff during this time to locate a unit. As some clients may need more support with this process, and some communities have very little housing stock that meet HUD's guidelines, providers are encouraged to provide both flexibility and support to participants to find a unit.
 - 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. Housing providers with scattered-site units should be prepared to provide more assistance to households who may need a higher level of support to identify an eligible unit.
 - Some households may need 30, 60, or 90 days to locate a unit, and in some extenuating circumstances may need longer than 90 days. Providers should evaluate on a case-by-case basis how long households may remain enrolled in the pre-move in phase. If participants are actively engaged in the housing search process, providers are encouraged to provide flexibility on the length of time for housing search.
- Program participants may be out of their unit for up to 90 days without termination due to an institutional stay (such as in-patient hospital or recovery center stay, incarceration, etc.)⁶⁴
- For participants who are incarcerated or institutional long-term or who have died: In PSH, members of the household living in the unit at the time of the project participant's death, long-term incarceration, or long-term institutionalization have a right to receive rental assistance until the expiration of the current lease.⁶⁵
- 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 participants⁶⁶. 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

⁶⁴ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/psh-retention>

⁶⁵ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/psh-retention>

⁶⁶ <https://endhomelessness.org/blog/how-master-leasing-can-help-the-affordable-housing-crisis/>

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- 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.
 - 4 keys to implementing a successful shared housing model⁶⁷: 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 housing⁶⁸.

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:

- Case managers help participants to identify and select among various permanent housing options based on their unique needs, preferences, and financial resource, including but not limited to:
 - Addressing issues that may impede access to housing (such as credit history, arrears, and legal issues);
 - Helping to negotiate manageable and appropriate lease agreements with landlords;
 - Making appropriate and time-limited services and supports available to families and individuals to allow them to stabilize quickly in permanent housing;
 - Monitoring participants’ housing stability and being available to resolve crises;
 - Providing or assisting the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals; and,
 - Ensuring that services provided are person-centered, respectful of individuals’ right to self-determination and voluntary.
- Case managers must have direct communications with their clients/program participants at least once a month. The frequency of case management services depends on the unique needs and situation of every program participant. The frequency of direct contact may increase due to the household’s homeless status, acute needs, and overall lack of housing stability. In-person

⁶⁷ https://www.wiboscoc.org/uploads/3/7/2/4/37244219/wi_bos_guide_on_shared_housing.pdf

⁶⁸ <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>

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meetings with clients are preferred when safe to do so and at a location of the client's choosing. Programs must offer participants case management and provide linkages, connections, and referrals to supportive services, such as medical and wellness, mental health, substance use, vocational/employment, and life skills, among others.

- Case managers may communicate and coordinate between a participant's supportive service providers, landlord/property manager, mental health and substance use recovery case managers or peer specialists, among others, with the participant's consent.
- Case managers must assess the participant's service needs at least annually.
- 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.
- 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.
 - While PSH projects should support Move On conversations where appropriate, the decision to move out of PSH to another resource should be driven by the client and cannot be mandated by the provider.
 - 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**⁶⁹.

⁶⁹ <https://www.hudexchange.info/news/snaps-in-focus-moving-on-strategies-to-support-stable-transitions-from-permanent-supportive-housing/>

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Performance Measures

- 100% of participants remain stably housed in PSH or exit to another permanent housing destination.
- 90% of households move into a housing unit in under 60 days (measured by days between project enrollment date and housing move in date).
- 50% of adults increase their income from start to exit or start to annual assessment.
- 70% of adult participants are connected to mainstream resources at annual assessment or exit.
- 95% of participants (adults and children) are connected to health insurance at annual assessment or exit.
- 100% of data recorded in HMIS for the following categories: Personally Identifiable Information, Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, and Income and Sources at Exit.
- 100% of Adult Stayers have Required Annual Assessment completed within 60 days (30 days prior to 30 days after) their Anniversary date in the program.
- 100% of Entry Assessments recorded in HMIS within 10 days of project enrollments.
- 100% of Exit Assessments recorded in HMIS within 10 days of project exit.
- 100% of Housing Move In dates entered within 2 days of move-in.

RAPID REHOUSING (RRH)

Rapid Re-Housing (RRH) is permanent housing that provides tenant-based rental assistance and supportive services to households experiencing homelessness.

There are some notable **differences between requirements for ESG-funded and CoC-funded RRH**. Those are noted below where applicable and are also outlined in **Appendix C**.

RRH is designed to help individuals and families to quickly exit homelessness and return to permanent housing. Rapid re-housing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are typically tailored to the unique needs of the household. The core components of a rapid re-housing program are:

Housing Identification

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

Rent and Move-In Assistance (Financial)

- Provide assistance to cover move-in costs, deposits, and the rental and/or utility assistance necessary to allow individuals and families to move immediately out of homelessness and to stabilize in permanent housing.

Rapid Re-Housing Case Management and Services

- Help individuals and families experiencing homelessness identify and select among various permanent housing options based on their unique needs, preferences, and financial resources.

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- Help individuals and families experiencing homelessness address issues that may impede access to housing (such as credit history, arrears, and legal issues).
- Help individuals and families negotiate manageable and appropriate lease agreements with landlords.
- Make appropriate and time-limited services and supports available to families and individuals to allow them to stabilize quickly in permanent housing.
- Monitor participants' housing stability and be available to resolve crises.
- 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 community resources related to benefits, employment, and community-based services (if needed/appropriate) so that they can sustain rent payments independently when rental assistance ends.
- Ensure that services provided are client-directed, respectful of individuals' right to self-determination, and voluntary.

Access

All households access CoC- or ESG-funded RRH Projects via Coordinated Entry and should be offered the option with as few barriers to project entry as possible.

Case managers cannot enroll a household into a HUD-funded RRH project unless/until the household has been referred by a Coordinated Entry Regional Manager from the By Name List (BNL).

Eligibility

- a) Category 1 literally homeless including those in emergency shelter or living in a place not meant for human habitation, OR
- b) Category 4 (fleeing/attempting to flee domestic violence)

Additional details on eligibility per the CoC Coordinated Entry Policies: To be eligible for PSH, a household's current living situation (on the night before contacting Coordinated Entry) must be one of the following:

- Living and sleeping outside or in places not meant for human habitation
- Fleeing or attempting to flee domestic violence or human trafficking
- Staying in an emergency shelter
- Staying in a hotel or motel paid for by a charitable organization or government program or,
- Exiting an institution (ex. jail, prison, a psychiatric hospital, medical hospital, or drug/alcohol treatment program) after staying there for no more than 90 days and having been literally homeless before entering that institution.

“Domestic Violence” includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human

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trafficking).⁷⁰

Coc RRH: Note that households who meet the HUD Category 1 **OR** Category 4 definitions of homelessness are eligible for CoC-funded Rapid Re-Housing, including the Rapid Re-Housing Housing component of a CoC grant program joint TH-RRH project.

ESG RRH: Only households who meet the HUD Category 1 definition of homelessness are eligible for ESG-funded Rapid Re-Housing services.

Eligibility criteria for Rapid Re-Housing programs do not include a prior period of sobriety, a commitment to participation in treatment, having income, or any other criteria designed to “predict” long-term housing stability other than willingness to engage the program and work on a self-directed housing plan.

CoC Rapid Rehousing Income Criteria: There are no income limits for CoC RRH.

ESG Rapid Rehousing Income Criteria: There are no income limits at initial evaluation/enrollment for ESG RRH. However, at annual re-evaluation participant's household must have an annual income that does not exceed **30 percent** of median family income for the area, as determined by HUD, to remain eligible for RRH.

Important Note Regarding Participant Eligibility for CoC-Funded Youth-Serving Providers: Per the FY24/FY25 CoC NOFO, “any youth-serving provider funded under this NOFO may serve unaccompanied youth aged 24 and under or families headed by youth aged 24 and under *who are living in unsafe situations*. HUD interprets “youth-serving provider” as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. *HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence.*”

Prioritization

Both ESG- and CoC-funded Rapid Re-Housing service providers must prioritize the enrollment of households who:

- Have been referred to the program by a Coordinated Entry Regional Manager through a combination of viewing the Housing Assessment Tool score, the longest length of time homelessness, and severity of needs.
- Based on the referrals received, the provider will then determine eligibility for the program.

Documentation

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

⁷⁰ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-4/>

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- Each project participants must have **Documentation of Homelessness (See Templates for CoC and ESG related programs Supplemental Resource)**
- An executed 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 Addendum⁷¹
- The initial lease term must be for at least a year, and terminable only for cause.
- 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 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.
- Case managers are required to submit a BNL Exit Request Form whenever an enrolled household moves into a unit (while still enrolled) or exits the program (successfully or otherwise) within 2 business days of the move-in date or program exit date so that Regional Managers can exit the Coordinated Entry Enrollment.
- Case managers must record the date a client or household physically moves into a unit after being enrolled in a Permanent Housing project into PA HMIS within 2 business days of the move-in date.

Duration and Amounts

Per HUD, the maximum length of time for RRH rental assistance is 24 months.

Aftercare: RRH supportive services may be provided for up to 6 months after the rental assistance ends.

Rapid Re-Housing case managers must provide participants with the least amount and shortest duration of both case management services and rental assistance needed to help them exit to permanent housing with stability.

⁷¹ <https://www.hud.gov/sites/documents/91067.doc>

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RRH rent and move-in assistance should be flexible and tailored to the varying and changing needs of a household while providing the assistance necessary for a household to immediately move out of homelessness and to stabilize in permanent housing.

RRH service providers should make efforts to maximize the number of households it is able to serve by providing households with financial assistance in a progressive manner, providing only the assistance necessary to stabilize in permanent housing.

Financial assistance in an RRH program should be individualized. Rather than giving every household the same “package” of assistance, financial assistance should be determined based on each household’s needs. The length and depth of financial assistance should be flexible enough to adjust to a household’s changing needs and circumstances. If a household’s income increases or decreases, the financial assistance can be flexible enough to be appropriately adjusted. For example, if a household started the program with income but loses a job in the third month, the RRH program should be able to increase or extend assistance, so they do not lose housing.

The goal is to help households until they are no longer imminently at risk of becoming homeless in the near term. It is important to recognize that RRH programs cannot alleviate every challenge a household may be experiencing and that a household may still be severely rent burdened by the end of the subsidy. If the RRH program has ended homelessness for that household and provided the foundation and support for it to be successful in staying housed, the RRH program has met its goal.⁷²

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
- 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.

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:

⁷² https://endhomelessness.org/wp-content/uploads/2016/10/NAEH-Rapid-Re-housingToolkit_2017-FINAL.pdf

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- 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)
- For ESG-funded RRH projects, unit rent must NOT exceed Fair Market Rent (FMR) AND it must not exceed Rent Reasonableness. For CoC-funded RRH 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.
- Case managers must use HUD's CoC Program Leasing Rent Determination Worksheet⁷³ or CoC Program Rental Assistance Rent Determination Worksheet⁷⁴ to determine whether or not a prospective unit's rent meets Fair Market Rent (FMR) and Rent Reasonableness standards. Leasing projects are limited to FMR. Rental assistance projects utilize rent reasonableness. The tools will also help case managers to determine how much rent they can pay with CoC Program funds. CoC Program recipients must use the tool that corresponds with the type of CoC Program funding they receive.
- Case managers must determine Fair Market Rent (FMR) by using HUD's online database⁷⁵. HUD annually estimates FMRs for Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas, and each nonmetropolitan county.
- For projects in which some or all of the costs of utilities are the responsibility of the program participant, case managers must utilize HUD Notice CPD-17-11: Determining a Program Participant's Rent Contribution, Occupancy Charge or Utility Reimbursement in the Continuum of Care (CoC) Program when the Program Participant is Responsible for the Utilities⁷⁶. This Notice clarifies HUD's expectation that recipients and subrecipients will consider reasonable monthly utility costs when calculating rent contributions or occupancy charges for program participants who are responsible for paying their own utilities. For the purpose of this notice, "utilities" exclude telephone but include gas, oil, electric, sewage, water, and trash removal.
- Scattered-site projects should engage in landlord engagement, including identifying available units, facilitating move-in, and ensuring participants' ongoing success in housing. 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

⁷³ <https://www.hudexchange.info/resources/documents/CoC-Program-Leasing-Rent-Determination-Worksheet.xlsm>

⁷⁴ <https://www.hudexchange.info/resources/documents/CoC-Program-Rental-Assistance-Rent-Determination-Worksheet.xlsm>

⁷⁵ <https://www.huduser.gov/portal/datasets/fmr.html>

⁷⁶ <https://www.hudexchange.info/resource/5630/notice-cpd-17-11-determining-program-participant-rent-contribution-in-the-coc-program/>

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- 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.
- Rapid Re-Housing programs must have written policies and procedures for landlord recruitment activities, including screening out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices.
- Rapid Re-Housing programs must offer a standard, basic level of support to all landlords who lease to program participants as detailed in a written agreement that must be signed by the case manager or Housing Locator and the landlord. At a minimum, this agreement must 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.
- Rapid Re-Housing service providers issue checks as expeditiously as possible, on time, and have the capacity to track payments to landlords and other vendors.
- In scattered-site projects, households should not be automatically terminated from the project (during the pre-move in phase) for failure to locate a rental unit within a specified amount of time. Housing providers are expected to provide support to participants with the housing search process. Participants are also expected to actively engage in the housing search process and engage with their assigned staff during this time to locate a unit. As some clients may need more support with this process, and some communities have very little housing stock that meet HUD's guidelines, providers are encouraged to provide both flexibility and support to participants to find a unit.
 - 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. Housing providers with scattered-site units should be prepared to provide more assistance to households who may need a higher level of support to identify an eligible unit.
 - Some households may need 30, 60, or 90 days to locate a unit, and in some extenuating circumstances may need longer than 90 days. Providers should evaluate on a case-by-

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case basis how long households may remain enrolled in the pre-move in phase. If participants are actively engaged in the housing search process, providers are encouraged to provide flexibility on the length of time for housing search.

- 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 participants⁷⁷. 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.
 - 4 keys to implementing a successful shared housing model⁷⁸: 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 housing⁷⁹.
- 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 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, 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

⁷⁷ <https://endhomelessness.org/blog/how-master-leasing-can-help-the-affordable-housing-crisis/>

⁷⁸ https://www.wiboscoc.org/uploads/3/7/2/4/37244219/wi_bos_guide_on_shared_housing.pdf

⁷⁹ <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>.

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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.

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:

- Case managers help participants to identify and select among various permanent housing options based on their unique needs, preferences, and financial resource, including but not limited to:
 - Addressing issues that may impede access to housing (such as credit history, arrears, and legal issues);
 - Helping to negotiate manageable and appropriate lease agreements with landlords;
 - Making appropriate and time-limited services and supports available to families and individuals to allow them to stabilize quickly in permanent housing;
 - Monitoring participants’ housing stability and being available to resolve crises;
 - Providing or assisting the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals; and,
 - Ensuring that services provided are person-centered, respectful of individuals’ right to self-determination and voluntary.
- Case managers must have direct communications with their clients/program participants at least once a month. The frequency of case management services depends on the unique needs and situation of every program participant. 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 when safe to do so and at a location of the client’s choosing. Programs must offer participants case management and provide linkages, connections, and referrals to supportive services, such as medical and wellness, mental health, substance use, vocational/employment, and life skills, among others.
- Case managers respect a program participant’s home as their own, scheduling appointments ahead of time, only entering when invited in and respecting the program participant’s personal property and wishes while in their home. Rapid Re-Housing programs have clear safety procedures for home visits that staff are trained on and that are posted clearly visible in office space and shared with program participants at intake and shared with participants and staff whenever changes are made.
- Case managers may communicate and coordinate between a participant’s supportive service providers, landlord/property manager, mental health and substance use recovery case managers or peer specialists, among others, with the participant’s consent.
- Case managers help participants improve their ability to have landlords accept their lease applications, especially if they have no income and/or bad credit.
- Case managers must assess the participant’s service needs at least annually.
- Case managers must work with participants to create a permanent housing stability plan (including goals related to education, employment, health, etc.) that is signed by both the case

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manager and the participant.

- Case managers must explain to participants basic landlord-tenant rights and responsibilities and the requirements of their specific lease.
- Case managers assist participants in making an informed choice with the goal that the participant will be able to maintain housing after program exit, even when the household will experience high housing cost burden. While participants ultimately chose their housing unit, case managers must support the participant in developing their housing plans and budgeting as they identify the best fit and make decisions for their short and long-term housing goals, including relocating to a more affordable unit during their participation in the RRH project.
- Case managers must help participants secure or increase income (through employment, public benefits, and/or on-going rental assistance) prior to program exit.
- Case managers must evaluate participant stability and types/amounts of assistance monthly.
- Case managers transition participants from rental assistance in a way that is coordinated with case management efforts to assist program participants to assume and sustain their housing costs.
- Case managers offer basic tenancy skills learning opportunities which can include instruction or guidance on basic landlord-tenant rights and responsibilities, requirements, and prohibitions of a lease, and meeting minimum expectations for care of the housing unit, such as not causing damage.
- Case managers work directly with the participant and landlord to resolve tenancy issues without threatening the participant's tenancy. The issue might be failure to pay rent, not properly maintaining the unit, or disturbing the quiet enjoyment of others. It also may include a landlord not meeting his/her obligations. Case managers work quickly to identify a corrective course of action, and, without breaking a participant's confidentiality, keep the landlord and participant informed about the program's action to mitigate the situation.
- Case managers help participants avoid evictions before they happen and maintain a positive relationship with the landlord. This can be done through mediation, open communication, negotiations, lease amendments, or, as a last resort, moving a household into a different unit prior to eviction and possibly identifying a new tenant household for the landlord's unit.
- If a participant receives a housing voucher (e.g., Housing Choice Voucher, Family Unification Program voucher, mainstream voucher, etc.), the participant must be encouraged to accept the voucher (although they must remain enrolled until they have received, not just applied for, the voucher). If the participant does not accept the voucher, they may remain enrolled in the Rapid Re-Housing program.

Performance Measures

- 95% of participants exit to permanent housing.
- 90% of households move into a housing unit in under 60 days (measured by days between project enrollment date and housing move in date).
- 50% of adults increase their income from start to exit or start to annual assessment.
- 70% of adult participants are connected to mainstream resources at annual assessment or exit.
- 95% of participants (adults and children) are connected to health insurance at annual assessment or exit.
- 100% of data recorded in HMIS for the following categories: Personally Identifiable Information, Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, and Income and Sources at Exit.

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- 100% of Adult Stayers have Required Annual Assessment completed within 60 days (30 days prior to 30 days after) their Anniversary date in the program.
- 100% of Entry Assessments recorded in HMIS within 10 days of project enrollments.
- 100% of Exit Assessments recorded in HMIS within 10 days of project exit.
- 100% of Housing Move In dates entered within 2 days of move-in.

TRANSITIONAL HOUSING (TH)

Transitional Housing (TH) provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing. TH projects can cover housing costs and accompanying supportive services for program participants for up to 24 months.⁸⁰

The standards adopted for TH will apply to projects funded under the CoC or ESG program. 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 Coordinated Entry and should be offered the option with as few barriers to project entry as possible.

Case managers cannot enroll a household into a CoC-funded or ESG-funded TH project unless/until the household has been referred by a Coordinated Entry Regional Manager from the By Name List (BNL).

Eligibility

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

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

Additional details on eligibility per the CoC Coordinated Entry Policies: To be eligible for TH, a household's current living situation (on the night before contacting Coordinated Entry) must be one of the following:

- Living and sleeping outside or in places not meant for human habitation
- Fleeing or attempting to flee domestic violence or human trafficking
- Staying in an emergency shelter
- Staying in a hotel or motel paid for by a charitable organization or government program or,

⁸⁰ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/transitional-housing/>

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- Exiting an institution (ex. jail, prison, a psychiatric hospital, medical hospital, or drug/alcohol treatment program) after staying there for no more than 90 days and having been literally homeless before entering that institution.

“Domestic Violence” includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).⁸¹

Important Note Regarding Participant Eligibility for CoC-Funded Youth-Serving Providers: Per the FY24/FY25 CoC NOFO, “any youth-serving provider funded under this NOFO may serve unaccompanied youth aged 24 and under or families headed by youth aged 24 and under *who are living in unsafe situations*. HUD interprets “youth-serving provider” as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence.”

Prioritization

Eastern PA Continuum of Care TH service providers must prioritize the enrollment of households who:

- Have been referred to the program by a Coordinated Entry Regional Manager through a combination of viewing the Housing Assessment Tool score, the longest length of time homelessness, disabling condition, and severity of needs.

Based on the referrals received, the provider will then determine eligibility for the program.

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 staff 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.

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:

- Participants in a TH project must have a signed lease, sublease, or occupancy agreement with the following requirements:
 - An initial term of at least one month

⁸¹ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-4/>

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- Automatically renewable upon expiration, except by prior notice by either party
- A maximum term of 24 months
- Passed Inspections.

Duration and Amounts

While TH may be used to cover the costs for up to twenty-four months of housing with accompanying supportive services, TH 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), typically not exceeding twelve months, except in extenuating circumstances. The actual length of stay for a particular household will vary based on their specific needs and the availability of affordable permanent housing resources.

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.

- Participants in a TH project must have a signed lease, sublease, or occupancy agreement with the following requirements:
 - An initial term of at least one month
 - Automatically renewable upon expiration, except by prior notice by either party
 - A maximum term of 24 months

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**).
- For projects with operating or leasing dollars where occupancy agreements or sub-leases

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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.

- To facilitate the movement of program participants into permanent housing, transitional housing projects should provide a wide range of supportive services to participants while they reside in the program that meets the needs of their program participants. Recipients can require program participants to take part in supportive services that are not disability-related services as a condition of participation in the program. For example, if the purpose of the project is to assist participants with substance abuse issues, projects may require participants to take part in substance abuse treatment services.⁸²

Performance Measures

- 95% of participants exit to permanent housing.
- 90% of participants have a length of stay of 12 months or less.
- Average length of stay for leavers (households who have exited the project) is 365 days or less.
- 50% of adults increase their income from start to exit or start to annual assessment.
- 70% of adult participants are connected to mainstream resources at annual assessment or exit.
- 95% of participants (adults and children) are connected to health insurance at annual assessment or exit.
- 100% of data recorded in HMIS for the following categories: Personally Identifiable Information, Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, and Income and Sources at Exit.
- 100% of Adult Stayers have Required Annual Assessment completed within 60 days (30 days prior to 30 days after) their Anniversary date in the program.
- 100% of Entry Assessments recorded in HMIS within 10 days of project enrollments.
- 100% of Exit Assessments recorded in HMIS within 10 days of project exit.

JOINT TRANSITIONAL HOUSING/RAPID REHOUSING (TH-RRH)

A Joint Transitional Housing - Rapid Re-Housing project (TH-RRH) includes two existing program components, Transitional Housing and Rapid Re-Housing, in a single project to serve individuals and families experiencing homelessness. CoC grant funded TH-RRH projects must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all program participants.

Projects must ensure program participants have choice in which program component they enroll in and must not be directed to one type of housing over the other. For example, a program participant may choose to enroll in the Rapid Re-Housing portion of the project only, the transitional housing portion of the project only, or may choose to first enroll in the Transitional Housing portion of the project and transition to the Rapid Re-Housing portion of the project. If a

⁸² <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/transitional-housing/supportive-services/>

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participant only needs a temporary stay in the transitional housing portion of the project, the service provider must be able to make available the financial assistance and supportive services that traditionally comes with Rapid Re-Housing assistance to that program participant even if the program participant chooses not to participate in the Rapid Re-Housing portion of the project.

Projects administering Joint TH/RRH projects must adhere 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 the Joint TH/RRH project type are addressed below.

Access

Projects must offer both components: participants are able to choose what housing setting(s) they prefer based on their unique situation and needs, which may include TH Only, RRH only, or TH followed by RRH. The choice should be driven by participant choice and needs.

Eligibility

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

- a) Category 1 literally homeless, including those in emergency shelter or living in a place not meant for human habitation, OR
- b) Category 4 (fleeing/attempting to flee domestic violence)

Additional details on eligibility per the CoC Coordinated Entry Policies: To be eligible for TH-RRH, a household's current living situation (on the night before contacting Coordinated Entry) must be one of the following:

- Living and sleeping outside or in places not meant for human habitation
- Fleeing or attempting to flee domestic violence or human trafficking
- Staying in an emergency shelter
- Staying in a hotel or motel paid for by a charitable organization or government program or,
- Exiting an institution (ex. jail, prison, a psychiatric hospital, medical hospital, or drug/alcohol treatment program) after staying there for no more than 90 days and having been literally homeless before entering that institution.

“Domestic Violence” includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).⁸³

Important Note Regarding Participant Eligibility for CoC-Funded Youth-Serving Providers: Per the FY24/FY25 CoC NOFO, “any youth-serving provider funded under this NOFO may serve unaccompanied youth aged 24 and under or families headed by youth aged 24 and under *who are living in unsafe situations*. HUD interprets “youth-serving provider” as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and

⁸³ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-4/>

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under. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence.”

Prioritization

Providers must prioritize the enrollment of households who:

- Have been referred to the program by a Coordinated Entry Regional Manager through a combination of viewing the Housing Assessment Tool score, the longest length of time homelessness, and severity of needs.
- Based on the referrals received, the provider will then determine eligibility for the program.

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 total length of assistance that a program participant can receive in the entire TH-RRH project is 24 months.

For example: If the program participant resides in the transitional housing portion of the project for 3 months, they can receive up to 21 additional months of RRH rental assistance (for a total of 24 months).

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 (per HUD, TH-RRH projects must have at least double the amount of RRH units as TH units).
- HMIS and 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.

Performance Measures

- 95% of participants exit to permanent housing.

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- 90% of households move into a housing unit in under 60 days (measured by days between project enrolment date and housing move in date).
- 50% of adults increase their income from start to exit or start to annual assessment.
- 70% of adult participants are connected to mainstream resources at annual assessment or exit.
- 95% of participants (adults and children) are connected to health insurance at annual assessment or exit.
- 100% of data recorded in HMIS for the following categories: Personally Identifiable Information, Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, and Income and Sources at Exit.
- 100% of Adult Stayers have Required Annual Assessment completed within 60 days (30 days prior to 30 days after) their Anniversary date in the program.
- 100% of Entry Assessments recorded in HMIS within 10 days of project enrollments.
- 100% of Exit Assessments recorded in HMIS within 10 days of project exit.
- 100% of Housing Move In dates entered within 2 days of move-in.
- RRH Component: 100% of Housing Move In dates entered within 2 days of move-in.

HOMELESS PREVENTION (HP)

ESG funds may be used to provide housing relocation and stabilization services and short-to-medium-term rental assistance to prevent an individual or family from moving into an emergency shelter, safe haven, or other place not meant for human habitation. Housing stability is the primary goal of Homeless Prevention programs. ESG Homeless Prevention is not an eviction prevention project. It is intended to prevent households from losing all housing and ending up in emergency shelter or on the street. *Non-ESG-funded homeless 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 imminent 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.

Case managers cannot enroll a household into an ESG-funded Homeless Prevention project unless/until the household has received an appropriate Coordinated Entry intake from an official Eastern PA Continuum of Care Call Center or Access Site CE Specialist.

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/SA (domestic violence or sexual assault) or attempting to flee DV/SA may be eligible for EITHER HP OR RRH resources, per HUD eligibility guidance. CE assessors may make referrals based on participant choice and resource availability. If referral to prevention resources is appropriate, the CE assessor may make referral to HP resources (including DV/SA-specific resources).

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Eligibility

The following categories of individuals or families are eligible for HP services⁸⁴:

- Category 2: Imminent Risk of Homeless within 14 days; or
- Category 4: Fleeing/Attempting to Flee Domestic Violence*; or
- At-risk of homelessness as defined at 24 CFR 576.2⁸⁵;

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 HUD⁸⁶.

“Domestic Violence” includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).⁸⁷

Prioritization

Households at imminent risk of homelessness within 14 days are prioritized for HP resources.

Imminent risk of homelessness means that:

1. Residence will be lost within 14 days of the date of application for homeless assistance;
2. No subsequent residence has been identified; *and*
3. The individual or family lacks the resources or support networks needed to obtain other permanent housing.

If there are multiple referrals for households who are at imminent risk of homelessness, HP providers should use the HP assessment tool to prioritize resources. The Eastern PA Continuum of Care has adopted its own Homelessness Prevention assessment tool to prioritize households eligible for services based on severity of need, including factors related to health, safety, income, ability, and veteran status, among others. ESG funded Homelessness Prevention case managers are required to complete the assessment in PA HMIS as part of program enrollment to prioritize households for assistance when there are more households than can be served at any given time. Prioritization is then based on the assessment score, with higher scoring households receiving priority.

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.

If there are no referrals for households at imminent risk of homelessness, HP providers can serve households who are:

⁸⁴ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>

⁸⁵ <https://www.law.cornell.edu/cfr/text/24/576.2>

⁸⁶ <http://www.huduser.org/portal/datasets/il.html>

⁸⁷ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-4/>

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- At-risk of homelessness as defined at 24 CFR 576.2⁸⁸;
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 HUD⁸⁹.

HMIS-participating Eastern PA Continuum of Care Homelessness Prevention service providers funded by other public and private grants (e.g., ERAP, PHARE, Home4Good, HAP, SSVF, philanthropic, etc.) must comply with prioritization standards established by their funding source, if required.

Documentation

Relevant documentation standards include the information presented in the “Record Keeping Standards 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.
 - The Landlord-Agency Agreement can also specify where the security deposit should be returned.
- 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,

⁸⁸ <https://www.law.cornell.edu/cfr/text/24/576.2>

⁸⁹ <http://www.huduser.org/portal/datasets/il.html>

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- Signatures of both parties.
- HUD-91067 VAWA Lease Addendum⁹⁰
- Other documents required in all case files:
 - **Passed Inspections (Minimum Habitability Standards and Lead-Based Paint)**
 - **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 risk of 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.
- Case managers are required to record CE Referral Outcome Information within 2 business days of processing a referral, including the acknowledgement date, processing date, result, and any comments that may be helpful to CE Specialists in making additional referrals for the clients.
- ESG program funded Homelessness Prevention projects require an income determination at intake to ensure participants meet income eligibility requirements of 30% or less of Area Median Income (AMI). Case managers must verify a program participant's income prior to enrollment and on a quarterly basis. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the participant's file.
- Case managers must recertify a program participant every three (3) months, or more frequently if income or household composition changes.
- Participant income, even if zero, must be entered into PA HMIS during Entry, Annual, and Exit Assessments as follows:
 - a. When a participant has income, but does not know the exact amount, a "Yes" response must be recorded for both the overall income question and the specific source, and the income amount must be estimated.
 - b. Income must be documented for the Head of Household and any other adult household members.
 - c. Income received by or on behalf of a minor child must be recorded as part of household income under the Head of Household. Income must be recorded at the participant-level for heads of household and adult household members.
 - d. Income data must 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 new employment, the response for Earned income would be "No."

⁹⁰ <https://www.hud.gov/sites/documents/91067.doc>

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Duration and Amounts

- Homelessness prevention case managers must provide participants with the least amount and shortest duration of both case management services and rental assistance needed to help them maintain permanent housing stability.
- Participants must exit the program in the shortest time possible after they have obtained enough income through employment and/or public benefits to pay 100% of their rent on their own. Participants must not receive housing subsidies for more than 12 months unless they have significant barriers to income. Significant barriers to income include poor employment history, no high school diploma/GED, a serious mental or physical health condition, recent or current experience of domestic violence, criminal background and/or being a head of household under 18 years old.
- The total period for which any program participant may receive ESG program funded Homelessness Prevention or Rapid Re-Housing services must not exceed 24 months during any 3-year period. The recipient may also set a maximum dollar amount and maximum period for which a program participant may receive any of the types of assistance or services described within the regulatory maximums.
- Each participant must pay the maximum amount of rent per month that they can afford.
- Case managers must assure compliance with the following standards for combining ESG Financial or Rental Assistance with Other Subsidies (§ 576.105(d) and § 576.106(c)):
 - No financial or rental assistance can be provided to a household receiving the same type of assistance from another public source for the same time period (except 6 months of the tenant's portion of arrears).
 - For households enrolled in other subsidized housing programs (such as Housing Choice Vouchers), HP funds can be used for up to 6 months of arrearages but cannot be used for ongoing rental payments.
 - Rental assistance may not be provided to program participants who are currently receiving replacement housing payments under the URA.
 - Rental assistance may be provided to an eligible program participant who is living in a housing unit developed with Low Income Housing Tax Credits or other development subsidies. Development subsidies are not considered rental assistance under ESG and therefore, they do not trigger the use with other subsidies restriction.
- Each type of assistance received must be qualified for individually (e.g., someone receiving rental assistance will not automatically receive financial assistance for utilities unless also meeting the necessary requirements for that expense).

Minimum Standards

- Individuals and families experiencing homelessness cannot be required to receive treatment or perform any other prerequisite activities as a condition for receiving rental assistance or other services.
- ESG-funded Homelessness Prevention service providers and case managers cannot make direct payments to program participants.
- Security deposits may be returned to the ESG-funded service provider organization or the participant based on each program's policies and procedures.
- Participants receiving more than one month of rental assistance are required to communicate with their case manager at least once per month via telephone, email, text, videoconference, or

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in-person, except where funding under the Violence Against Women Act (VAWA) or Family Violence Prevention and Services Act (FVSP) prohibits the recipient or subrecipient from making shelter or housing conditional upon receipt of services.

- Program participants must comply with the following standards regarding late payments (§ 576.106(f)):
 - The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.
 - Projects must make timely payments to owners in accordance with the rental assistance agreement.
 - The recipient or subrecipient is solely responsible for paying (with non-ESG funds) late payment penalties that it incurs.
- In the case of ongoing rental assistance using ESG HP funds, rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent established by HUD and complies with HUD's standard of rent reasonableness. This condition must be documented in the participant's file.
- Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services or rent arrears.
 - For ESG HP rental arrears assistance: Rental arrears assistance is considered rental assistance. However, rent reasonableness and FMR requirements do not apply when a program participant receives only rental arrears assistance. Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears. While FMR and rent reasonableness is not required, the goal of the ESG program is to help program participants achieve stability in permanent housing; therefore, it would not be advisable to assist the household with arrears in order to stay in a unit with rent that the household will not be able to sustain.
- When ESG Rental Assistance and/or Housing Relocation and Stabilization Services are provided under the Homelessness Prevention component to help a program participant remain in or move into permanent housing, the ESG minimum habitability standards apply to either the current unit (if the program participant is staying in place) or to a new unit (if the program participant is moving). Even if only a minimal amount of Housing Relocation and Stabilization Services assistance—such utility arrears/payments (Financial Assistance) or housing stability case management (Services)—is provided under the Homelessness Prevention component to assist a program participant to stay in their unit, the habitability standards apply to the unit and must be documented in the program participant's file.

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.

Performance Measures:

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- 95% of participants exit to permanent housing.
- 90% of participants' length of time in program is less than 365 days.
- 50% of adults increase their income from start to exit or start to annual assessment.
- 70% of adult participants are connected to mainstream resources at annual assessment or exit.
- 95% of participants (adults and children) are connected to health insurance at annual assessment or exit.
- 100% of data recorded in HMIS for the following categories: Name, Date of Birth, Race/Ethnicity, Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, and Income and Sources at Exit.
- 100% of Adult Stayers have Required Annual Assessment completed within 60 day window (30 days prior to 30 days after) their Anniversary date in the program.
- 100% of Entry Assessments recorded in HMIS within 10 days of project enrollments.
- 100% of Exit Assessments recorded in HMIS within 10 days of project exit.

EMERGENCY SHELTER (ES)

Emergency Shelters provide immediate, low-barrier and temporary places for people experiencing homelessness to stay while they seek to regain permanent housing stability. 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

Emergency Shelter case managers cannot enroll a household into any HUD ESG or CoC funded project unless/until the household has received an appropriate Coordinated Entry intake from an official Eastern PA Continuum of Care Call Center or Access Site CE Specialist. The only exception to this rule is that unsheltered households may be enrolled in an Emergency Shelter for up to 2 business days before receiving a Coordinated Entry intake to focus on crisis stabilization and/or if Coordinated Entry services are not available at the time of enrollment (i.e., on an evening, weekend, or federal holiday).

Eligibility

The following categories of individuals or families are eligible for ES services⁹¹:

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

"Domestic Violence" includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human

⁹¹ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>

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trafficking).⁹²

Prioritization

Households sleeping/residing in unsheltered locations, including streets, encampments, parks, cars, abandoned buildings, transit stations, and other places not meant for human habitation (Category 1) must always be prioritized for emergency shelter beds over households that are sleeping/residing in transitional housing, bridge housing, doubled up, or couch surfing (Category 2).

Documentation

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

- Case managers must create or update client records and case notes in PA HMIS within 2 business days related to program entry, exit, client meetings, connection to supportive services, and other case management activities.
- Case managers are required to record CE Referral Outcome Information within 2 business days of processing a referral, including the acknowledgement date, processing date, result, and any comments that may be helpful to CE Specialists in making additional referrals for the client.

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.
- The frequency of case management services depends on the unique needs and situation of every program participant.
- 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, providers must provide referrals and make attempts to help the participant identify alternative shelter.
 - a. Violence towards other guests or staff
 - b. Excessive damage to property
 - c. Theft from the shelter or other guests
 - d. Need for medical services beyond those the shelter is equipped to provide
 - e. 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.
 - f. 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

⁹² <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-4/>

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there (e.g., proximity to school).

Minimum Standards

- 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 relevant federal, state, and local laws regarding non-discrimination and equal access.
- Making it known that use of the facilities and services are available to all on a nondiscriminatory basis.
- ES that serves families with children are prohibited from denying assistance to or separating members of a family with children based on gender or age.
- Emergency shelters should not charge fees to participants.
- Hotel or motel vouchers may be provided where no appropriate emergency shelter is available. Case managers must utilize all other Emergency Shelter Written Standards with households residing in a hotel or motel to the greatest extent possible. In addition, case managers must attempt to communicate with households staying in a hotel or motel at least once per week via phone, text, videoconference, or in person to ensure that they are pursuing their permanent housing goal plans and utilizing supportive services.
- Utilize housing retention best practices to ensure the participant does not return to literal homelessness through an assisted rapid resolution conversation and/or providing connections to Connect to Home CES and other community services;
- Provide written notice to the participant detailing the reason(s) for termination. The participant's file must document in writing any attempts (e.g., phone, mail, home visit, etc.) to contact the individual in order to discuss the pending termination;
 - a. Provide the participant with an opportunity to provide their objection in the form of a written or verbal grievance. If the grievance is presented verbally (in-person, over the phone, etc.), the program must document a summary of the grievance;
 - Document in writing the outcome of the termination after the grievance process is completed and signed by the appropriate case manager or supervisor and kept in the client's file; and,
 - Complete an Exit Assessment in PA HMIS.
 - Termination does not prohibit the program from providing additional assistance to the participant in the future nor prohibit the participant from receiving assistance from another project.
- Shelters should work with participants to obtain their necessary documentation, if applicable (i.e., Social Security cards, birth certificates, chronic status verification, etc.). These efforts should be documented in case files and case notes.
- Emergency Shelter programs must attempt to create safe arrangements for pets within the shelter if possible and otherwise utilize off-site lodging, kennels, hotel/motel vouchers, etc., if necessary.
- Persons seeking shelter or housing cannot be denied based on their need for an assistance or service animal under the American with Disabilities Act.
- Emergency Shelter programs must offer safe and secure storage for personal belongings (e.g.,

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security cameras, locked areas, storage units, etc.).

- Any emergency shelter that receives ESG funds for shelter operations (including minor repairs) must meet the minimum safety, habitability, sanitation, and privacy standards under 24 CFR 576.403(b). Refer to the funding year application guidelines for what percent of the project budget can be spent on shelter operations. In addition:
 - If the grant recipient establishes any other standards that add to or exceed HUD’s minimum standards, the recipient/subrecipient must ensure that the shelter meets these standards.
 - The shelter must be inspected on-site to ensure that it meets the minimum standards before ESG funds are provided for shelter operations.
 - The shelter must meet all standards for the entire period during which ESG funds are provided for operating the emergency shelter. For example, if operating assistance is provided for 24 months, the shelter must remain in compliance with the minimum standards for those 24 months.
 - If the shelter fails to meet the minimum standards, ESG funds (under either shelter operations or renovation) may be used to bring it up to the minimum standards.
 - If the shelter continues to receive ESG shelter operating funds over a period of time, then a periodic, on-site inspection must be conducted each time the shelter receives funds. For example, if the shelter receives an annual allocation of funds from the ESG recipient, an inspection must be conducted annually.
 - If the provider moves the shelter to a new site or structure, that new site or structure must meet all emergency shelter standards for the remaining period that ESG funds are used for operating expenses.

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:

- Emergency Shelters must operate with a low-barrier approach, meaning as few prerequisites for admission to shelter, including substance abuse, no income, criminal background, poor credit, or fleeing domestic violence (nor can survivors be required to have a PFA to access shelter).
- Individuals and families experiencing homelessness cannot be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter or other services. Supportive services are voluntary. Emergency Shelter programs cannot charge participants fees for enrollment or services.
- Case managers must attempt to assist households in rapidly resolving their current living situation through a problem-solving conversation to divert them from enrolling in shelter by helping them identify opportunities to stay with friends or family if possible.
- Emergency Shelter programs must provide a safe and welcoming environment while treating their guests with dignity and respect.

Performance Measures:

- 47% of participants exit to permanent housing.

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- 90% of participants' length of time in program is less than 180 days.
- 50% of adults increase their income from start to exit or start to annual assessment.
- 70% of adult participants are connected to mainstream resources at annual assessment or exit.
- 95% of participants (adults and children) are connected to health insurance at annual assessment or exit.
- 100% of data recorded in HMIS for the following categories: Name, Date of Birth, Race/Ethnicity, Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, and Income and Sources at Exit.
- 100% of Adult Stayers have Required Annual Assessment completed within 60 day window (30 days prior to 30 days after) their Anniversary date in the program.
- 100% of Entry Assessments recorded in HMIS within 2 business days of project enrollments.
- 100% of Exit Assessments recorded in HMIS within 2 business days of project exit.

STREET OUTREACH (SO)

Street Outreach provides essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered people experiencing homelessness who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Access

Outreach workers are able to enroll households across the community, outside office walls, engaging with participants early and often. Street Outreach case managers are required to accept referrals from the Eastern PA Continuum of Care Coordinated Entry System (but not exclusively). Street outreach case managers can serve households who are referred through CES and those who are not.

Eligibility

The following categories of Individuals or families are eligible for SO services⁹³:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1)

SO is intended to serve households who are currently unsheltered, including those living on the street, in cars, or in other places not meant for human habitation.

“Domestic Violence” includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).⁹⁴

⁹³ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>

⁹⁴ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-4/>

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Prioritization

Anyone who is unsheltered is prioritized for SO.

Documentation

Relevant documentation standards include the information presented in the “Record Keeping Standards 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 case files/case notes.
- For verification of literal homelessness, case managers must attempt to meet people where they are currently living or in a community setting (warming/cooling station, public library, public park, local coffee shop, etc.).
- ESG- and CoC-funded Street Outreach case managers are required to enroll, manage, and exit their clients in PA HMIS. Other street outreach providers are strongly encouraged to do so.
- Case managers are required to record CE Referral Outcome Information within 2 business days of processing a referral, including the acknowledgement date, processing date, result, and any comments that may be helpful to CE Specialists in making additional referrals for the client.
- Case managers must create or update PA HMIS client records or case notes within 72 business hours of contact with an engaged or enrolled project participant.

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. The frequency of direct contact may increase due to the household’s homeless status, acute needs, and overall lack of housing stability.

Case managers will work with unsheltered households until their housing crisis: has been resolved, they have been enrolled in a shelter or housing project, the participant no longer wishes to be engaged, or no contact has occurred for over one (1) year. Case managers must conduct an annual assessment with participants that remain in contact for over one (1) year.

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

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standards for this project type include:

- Street Outreach case managers must locate, identify, and build relationships with unsheltered people experiencing homelessness for the purpose of providing immediate support, intervention, and connections to Coordinated Entry as well as mainstream and community services.
- Street Outreach must be conducted with a minimum of two (2) trained persons whenever possible; street outreach case managers working alone will always let someone know where they will be.
- Case managers attempt an assisted rapid resolution conversation to help unsheltered households find a temporary living situation as an alternative to emergency shelter (but shelter enrollment is always preferred to any household living on the street or another place not intended for habitation).
- If an assisted rapid resolution conversation is unsuccessful, a case manager must attempt to help the household enroll into Coordinated Entry to receive a referral to emergency shelter and placement on the By Name List (BNL) in PA HMIS for a potential housing project enrollment.
- Case managers must provide participants with access to basic needs, including personal identification, health care services, mainstream benefit enrollments, food, clothes, hygiene items, etc.
- If an unsheltered family with one or more children under 18 years old must be encountered by a case manager, the case manager may choose to contact Childline at 1-800-932-0313 if they suspect child abuse or neglect. Staff should follow PA Mandated Reporter laws.⁹⁵
- If an unaccompanied minor is encountered by a case manager, they must attempt to immediately place the minor in an emergency shelter. If shelter is refused or not available, the case manager must contact both 911 and Childline at 1-800-932-0313.
- In partnership with physical health professionals, Street Outreach provider organizations will connect unsheltered households to emergency health services, including direct outpatient treatment of medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
- In partnership with mental health professionals, Street Outreach provider organizations will make referrals to direct outpatient treatment of mental health conditions by licensed professionals in community-based settings (e.g., streets, parks, and campgrounds) for those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.

Performance Measures:

- 75% of participants exit to temporary (Emergency Shelter or Transitional Housing) or permanent housing destinations.
- 90% of participants' length of time in program is less than 365 days.
- 50% of adults increase their income from start to exit or start to annual assessment.
- 70% of adult participants are connected to mainstream resources at annual assessment or exit.

⁹⁵ https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/keepkidssafe/clearances/documents/FAQ_Mandated%20Reporter.pdf

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- 95% of participants (adults and children) are connected to health insurance at annual assessment or exit.
- 100% of data recorded in HMIS for the following categories: Name, Date of Birth, Race/Ethnicity, Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, and Income and Sources at Exit.
- 100% of Adult Stayers have Required Annual Assessment completed within 60 day window (30 days prior to 30 days after) their Anniversary date in the program.
- 100% of Entry Assessments recorded in HMIS within 10 days of project enrollments.
- 100% of Exit Assessments recorded in HMIS within 10 days of project exit.

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 Street Outreach 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 may accept referrals through CE, or may enroll households outside the CE process.

Eligibility

The following categories of individuals or families are eligible for SSO projects⁹⁶:

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

“Domestic Violence” includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).⁹⁷

Important Note Regarding Participant Eligibility for CoC-Funded Youth-Serving Providers: Per the FY24/FY25 CoC NOFO, “any youth-serving provider funded under this NOFO may serve unaccompanied youth aged 24 and under or families headed by youth aged 24 and under *who are living in unsafe situations*. HUD interprets “youth-serving provider” as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and

⁹⁶ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>

⁹⁷ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-4/>

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under. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence.”

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 “Record Keeping Standards 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 case files and case notes.

Duration and Amounts

Households may be terminated from the project when: 1) They access permanent housing, or 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.

When households achieve permanent housing (either with or without subsidy), they should be exited from the SSO project.

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:

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

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- 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:

- 75% of participants exit to permanent housing destinations.
- 90% of participants' length of time in program is less than 365 days.
- 50% of adults increase their income from start to exit or start to annual assessment.
- 70% of adult participants are connected to mainstream resources at annual assessment or exit.
- 95% of participants (adults and children) are connected to health insurance at annual assessment or exit.
- 100% of data recorded in HMIS for the following categories: Name, Date of Birth, Race/Ethnicity, Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, and Income and Sources at Exit.
- 100% of Adult Stayers have Required Annual Assessment completed within 60 day window (30 days prior to 30 days after) their Anniversary date in the program.
- 100% of Entry Assessments recorded in HMIS within 10 days of project enrollments.
- 100% of Exit Assessments recorded in HMIS within 10 days of project exit.

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 for additional detail⁹⁸.

⁹⁸ <https://pennsylvaniacoc.org/balance-stateeastern-pa-coc/connect-home-coordinated-entry-system-eastern-pa>

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APPENDIX A – Project Type Definitions

Project Type	Project Definitions
<p>Coordinated Entry (CE)</p> <p><i>[funded by HUD CoC Program Supportive Services for Coordinated Entry (SSO-CE)]</i></p>	<p>Coordinated entry is a consistent, streamlined process for accessing the resources available in the homeless crisis response system. Through coordinated entry, a CoC ensures that the highest need, most vulnerable households in the community are prioritized for services and that the housing and supportive services in the system are used as efficiently and effectively as possible.</p>
<p>Emergency Shelter (ES)</p>	<p>Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for people experiencing homelessness in general or for specific populations of those experiencing homelessness which does not require occupants to sign leases or occupancy agreements.</p>
<p>Homelessness Prevention (HP)</p>	<p>Homelessness Prevention activities are designed to prevent an individual or family from moving into an emergency shelter or living in a public or private place not meant for human habitation. Component services and assistance generally consist of short-term and medium-term tenant-based or project-based rental assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair.</p> <p>Homelessness prevention also refers to a specific project type funded by the HUD Emergency Solutions Grant (ESG). Funds are provided to individuals and families who meet the “at risk of homelessness” definition or who meet the criteria in paragraphs (2), (3), or (4) of the “homeless” definition in 24 CFR 576.2 and have an annual income below 30% of the median family income as determined by HUD, and lack the resources to obtain permanent housing.</p>
<p>Permanent Supportive Housing (PSH)</p>	<p>A HUD CoC grant funded program component type providing indefinite leasing or rental assistance combined with supportive services for people with disabling conditions experiencing homelessness so that they may live independently.</p>
<p>Rapid Re-Housing (RRH)</p>	<p>A permanent housing solution emphasizing housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into housing.</p>

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Project Type	Project Definitions
Street Outreach (SO)	Essential services related to reaching out to all unsheltered individuals and families experiencing homelessness within the CoC’s geographic area, including those least likely to request assistance. Services include connection to emergency shelter, housing, critical/crisis services, and urgent, non-facility-based care.
Supportive Services Only (SSO)	CoC-funded SSO projects (<i>not including SSO-CE projects for CE, which are addressed in the “CE” project section</i>), 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.
Transitional Housing - Rapid Re-Housing (TH-RRH)	A Joint transitional housing (TH) and rapid re-housing (PH-RRH) component project includes two existing program components—TH and PH-RRH—into a single project to serve individuals and families experiencing homelessness.
Transitional Housing (TH)	<p>Transitional Housing (TH) provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing. TH projects can cover housing costs and accompanying supportive services for program participants.</p> <p>CoC grant funded TH-RRH projects must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all program participants.</p>

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APPENDIX B – Homeless Definitions

More info is available in the HUD CoC/ESG virtual binders:

<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>.

Category 1: Literally Homeless

<p>Definition</p>	<p>Individual or family who lacks a fixed, regular, and adequate night-time residence, meaning:</p> <p>(i) Has a primary nighttime residence that is a public or private place not meant for human habitation;</p> <p>(ii) Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u></p> <p>(iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.</p>
<p>Frequently Asked Questions</p>	<ol style="list-style-type: none"> 1. If a household is self-paying their own stay in a hotel or motel, are they literally homeless? No. A household staying in a hotel or motel paid for by themselves, a friend, or a family member does not meet the Category 1 definition of homelessness. 2. When is a house, apartment, single room occupancy (SRO), or mobile home considered a place not meant for human habitation? A place not meant for human habitation typically refers to cars, parks, sidewalks, abandoned buildings, camps, or on the street. However, a house, apartment, SRO, or mobile home may be considered a place not meant for human habitation if it is condemned and/or does not have access to utilities like electricity, water, or heat because the water or electric lines are broken or damaged beyond repair. However, if one or more utilities are shut off due to arrears or unpaid bills, then the house, apartment, SRO, or mobile home is meant for human habitation and the household is not considered literally homeless (though they may be eligible for utility assistance). <p>Is literal homelessness based on where the household resided/slept the night before contacting an Eastern PA Continuum of Care service provider (e.g., Coordinated Entry, Street Outreach, Emergency Shelter, etc.) or where the household intends to sleep the night of the contact? The night before. Literal homelessness is based on what HUD refers to as a “current living situation”. A household’s current living situation is where they spent the previous night, not where they think they are going to spend the next one.</p>

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Recordkeeping Requirements	<ol style="list-style-type: none">1. Written observation by the outreach worker; or2. Written referral by another housing or service provider; or3. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter.4. For individuals exiting an institution- one of the forms of evidence above <u>and</u>:<ol style="list-style-type: none">a. Discharge paperwork or written/oral referral orb. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution.
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Category 2: Imminent Risk of Homelessness

Definition	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <p>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</p> <p>(ii) No subsequent residence has been identified; <u>and</u></p> <p>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.</p>
Frequently Asked Questions	<ol style="list-style-type: none"> 1. Does a doubled-up household staying with friends or family but without a lease in their name (i.e., couch surfing) meet the definition of Category 2 Imminent Risk of Homelessness? Yes. Households that are "doubled up" or temporarily living with friends or family may be considered homeless under Category (2) of the Homeless Definition if the service provider can document that they meet all the criteria above. 2. How can a doubled-up household provide documentation since there is not a landlord-tenant relationship? HUD's homeless definition under Category 2 allows for the cases where the individual or family who must leave a unit will become homeless and is sharing housing with others (such as doubled-up situations) where there is not a landlord-tenant relationship. The individual or family seeking assistance may provide "an oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay..." The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either be: <ol style="list-style-type: none"> a. verified by the owner or renter of the housing where the individual or family is living and documented by a written certification by the owner or renter or by the intake worker's recording of the oral statement or b. a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the service provider intake worker is unable to contact the owner or renter.
Recordkeeping Requirements	<ol style="list-style-type: none"> 1. A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> 2. For individuals and families leaving a hotel or motel- evidence that they lack the financial resources to stay; <u>or</u> 3. A documented and verified oral statement <u>and</u> 4. Certification that no subsequent residence has been identified <u>and</u> 5. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

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Category 3: Homeless Under Other Federal Statutes

Definition	<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers.
Frequently Asked Questions	<p>Can an ESG or CoC grant program funded project serve Category 3 households?</p> <p>For ESG-funded projects, the answer is yes. ESG grant recipients can use this category with adequate documentation to ensure that a household meets the eligibility criteria outlined in the definition above.</p> <p>For CoC-funded projects, the answer is no.</p>
Recordkeeping Requirements	<ol style="list-style-type: none"> 1. Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u> 2. Certification of no PH in last 60 days; <u>and</u> 3. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u>, 4. Documentation of special needs <u>or</u> 2 or more barriers.

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Category 4: Fleeing/Attempting to Flee Domestic Violence

Definition	<p>Any individual or family who:</p> <p>(i) 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.</p> <p>(ii) Has no other safe residence; <u>and</u></p> <p>(iii) Lacks the resources to obtain other safe permanent housing.</p>
Frequently Asked Questions	<p>Do people fleeing or attempting to flee sexual assault, other forms of intimate partner violence, or human trafficking meet the HUD Category 4 definition of homelessness? Yes. Category 4, as outlined in the HEARTH Act, specifically addresses homeless status for survivors of domestic violence, dating violence, sexual assault, stalking, and human trafficking.</p>
Recordkeeping Requirements	<p>For victim service providers:</p> <ol style="list-style-type: none"> 1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. <p>For non-victim service providers:</p> <ol style="list-style-type: none"> 1. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u> 2. Certification by the individual or head of household that no subsequent safe residence has been identified; <u>and</u> 3. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain safe permanent housing.

EASTERN PA CONTINUUM OF CARE WRITTEN STANDARDS

At Risk of Homelessness

For individuals and families who do not meet the definition of "homeless" under any of the categories established in the Homeless Definition final rule, the McKinney-Vento Act was amended to allow homeless prevention assistance to be provided to persons who are "at risk of homelessness." The following table provides a high-level overview of the criteria for defining individuals and families who may qualify as at risk of homelessness under three categories, including: 1) individuals and families; 2) unaccompanied children and youth; and 3) families with children and youth.⁹⁹

Households that meet the definition of at risk of homelessness may be served by Coordinated Entry and ESG-funded Homelessness Prevention projects.

<p>Individuals and Families</p>	<p>An individual or family who:</p> <ul style="list-style-type: none"> (i) Has an annual income below 30% of median family income for the area; <u>AND</u> (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; <u>AND</u> (iii) Meets one of the following conditions: <ul style="list-style-type: none"> (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u> (B) Is living in the home of another because of economic hardship; <u>OR</u> (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u> (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u> (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u> (F) Is exiting a publicly funded institution or system of care; <u>OR</u> (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan.
<p>Unaccompanied Children and Youth</p>	<p>A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.</p>
<p>Families with Children and Youth</p>	<p>An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.</p>

⁹⁹ <https://www.hudexchange.info/resource/1975/criteria-for-definition-of-at-risk-of-homelessness/>

EASTERN PA CONTINUUM OF CARE WRITTEN STANDARDS

APPENDIX C – ESG Rapid Rehousing vs. CoC Rapid Rehousing

Criterion	ESG-Funded RRH	CoC-Funded RRH
Eligibility	HUD Category 1 only.	HUD Category 1 <u>or</u> Category 4.
Income Assessment	After initial intake and enrollment, an income assessment must be made at least annually to ensure the participant meets income eligibility requirements of 30% or less of Area Median Income (AMI) to receive assistance beyond the first 12 months.	Not required.
Eligible Use of Funds	Up to 24 months of rental assistance <u>and</u> rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears).	Up to 24 months of rental assistance.
Rental Assistance Type	Tenant Based Rental Assistance (TBRA) and Project Based Rental Assistance (PBRA).	Tenant Based Rental Assistance (TBRA) only.
Housing Relocation and Stabilization Services: Financial Assistance	<ul style="list-style-type: none"> ● Rental application fees ● Security deposits (up to 2 months) ● Last month's rent ● Utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears) ● Moving costs <p>*Allowable costs will depend on what is in a project's grant agreement with the ESG recipient.</p>	<ul style="list-style-type: none"> ● Security deposits (up to 2 months) ● First and last month's rent ● Property damage (up to 1 month) <p>NOTE: Rental application fees, utility deposits, and moving costs are eligible expenses within a CoC project's supportive services budget.</p> <p>*Allowable costs will depend on what is in a project's grant agreement with HUD.</p>
Housing Relocation and Stabilization Services: Other	<p>Service costs:</p> <ul style="list-style-type: none"> ● Housing search and placement ● Housing stability case management ● Mediation 	<p>Supportive services:</p> <ul style="list-style-type: none"> ● Case management ● Childcare ● Education services ● Employment assistance and job training

EASTERN PA CONTINUUM OF CARE WRITTEN STANDARDS

Criterion	ESG-Funded RRH	CoC-Funded RRH
	<ul style="list-style-type: none"> • Legal services • Credit repair <p>*Allowable costs will depend on what is in a project’s grant agreement with the ESG recipient.</p>	<ul style="list-style-type: none"> • Food • Housing search and counseling services, including mediation, credit repair, and payment of rental application fee • Legal services • Life skills training • Mental health services • Moving costs • Outpatient health services • Outreach services • Substance abuse treatment services • Transportation • Utility deposits <p>*Allowable costs will depend on what is in a project’s grant agreement with HUD.</p>
Lease Requirements	<ul style="list-style-type: none"> • A written lease between the owner and the program participant is required for TBRA and PBRA. • For program participants living in housing with PBRA, the lease must have an initial term of one year. There is no minimum lease period for TBRA. • The only exception to the written lease requirement is in the case of rental assistance provided solely for rental arrears. 	Program participants receiving TBRA must sign a lease of at least one year that is renewable (for a minimum term of one month) and terminable only for cause.
Limit on Service Provision	<ul style="list-style-type: none"> • Housing stability case management assistance may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 	Supportive services may be provided until 6 months after rental assistance stops.

EASTERN PA CONTINUUM OF CARE WRITTEN STANDARDS

Criterion	ESG-Funded RRH	CoC-Funded RRH
	months during the period in which the program participant is living in permanent housing.	

APPENDIX D – CoC Transfer Policy

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APPENDIX E – Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and/or Human Trafficking

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APPENDIX F – VAWA Requirements and Cover Sheets

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APPENDIX G - PA HMIS Collaborative Client Consent

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