



## **Policy for the Administration of CoC & ESG Assistance for the Northwest Continuum of Care (Mn-506)**

### **ABSTRACT**

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

## Contents

|  |    |
|--|----|
| <b>Guiding Strategies</b> .....  | 3  |
| <b>ESG and CoC Program Overview</b> .....  | 4  |
| Program Component Types.....   | 4  |
| <b>REGION-WIDE POLICIES</b> .....  | 5  |
| Homeless Management of Information System (HMIS) Participation and Reporting ...                 | 5  |
| Funding Obligations.....   | 5  |
| Program Description for each Component.....  | 5  |
| <b>Program Referral Criteria</b> .....   | 13 |
| <b>Determining &amp; Prioritizing Resources</b> .....  | 14 |
| Chronic Homeless Prioritization Policy .....   | 15 |
| Veterans Preference.....   | 15 |
| Income Eligibility for ESG .....   | 16 |
| Income Recertification .....   | 16 |
| Occupancy Charges and Rent.....  | 17 |
| Definitions.....   | 18 |
| <b>Coordinated Entry</b> .....   | 20 |
| <b>School Enrollment and Connection to Appropriate Services for All Children Policy</b><br>..... | 20 |
| <b>Family Separation and Emergency Shelter and Transitional Housing</b> .....                    | 20 |
| <b>Emergency Transfer Planning</b> .....   | 21 |
| <b>Low Barrier Policy</b> .....  | 21 |
| <b>Coordination of Services</b> .....  | 21 |
| Component services include:.....   | 22 |
| <b>Policy Amendments</b> .....   | 22 |

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

Both the Emergency Solution Grant (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Rules state that the Continuums of Care must establish written rules for the administration of ESG and CoC assistance. All programs that receive ESG or CoC funding are required to abide by these written standards. [24 CFR part 578](#) governs the CoC program, authorized by Subtitle C of Title IV of the McKinney-Vento Homeless Assistance Act (the Act; [42 U.S.C. 11381-11389](#)). The CoC strongly encourages programs that do not receive either of these sources of funds to accept and utilize these written standards.

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

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

### **Guiding Strategies**

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

- Support Continuum of Care, and MN Consolidated Plans.
- Foster greater and rapid access to permanent housing, including implementing Housing First, client choice and barrier free principals.
- Support stabilizing households in permanent housing once housed, utilizing harm reduction principals, linkage to mainstream resources, creative client engagement, and individualized case plans using evidence-based assessments (identifying needs, strengths, and barriers).
- Support Coordinated Entry, helping to develop a fair, rapid, coordinated, evidence based, and transparent homeless response system.
- Leverage existing resources to achieve the match and case management requirements and to avoid duplication of services.
- Support federal, regional and local goals for priority populations, including but not limited to veterans, youth, persons with disabilities, families and others.

- Allow for updates that respond to the changing needs, population and resources in the CoC.
- Comply with eligibility and verification requirements and locally established standards (HMIS, HUD, housing status, habitability standards, homeless definitions, etc.).
- Ensure that persons experiencing homelessness who enter programs throughout the CoC will be provided with a consistent process when accessing and receiving housing with services designed for persons experiencing homelessness.
- Gather data vital to homeless planning to assure effective use of scarce resources and quality of care.
- Assure compliance with federal and state funding requirements and goals.

### ESG and CoC Program Overview

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

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

### Program Component Types

1. Outreach
2. Prevention
3. Transitional Housing
4. Permanent Housing:
  - a. Rapid-Rehousing
    - i. CoC-funded
    - ii. State-funded
  - b. Long-term Homeless Vouchers

c. Permanent Supportive Housing

## REGION-WIDE POLICIES

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

- A. ESG and CoC recipients must assure compliance with all HUD record-keeping provisions, including use of the HMIS. HUD requires that ESG and CoC recipients and providers enter client-level data into an HMIS.
- B. Programs are required to keep a record of all clients that are screened and classified as ineligible. Recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive assistance, the record must include documentation of the reason for that determination.
- C. Programs required to participate in HMIS shall enter into a HMIS agreement and other data collection, sharing or reporting agreements as required by HUD, the HMIS administrator, or the CoC.

### Funding Obligations

- A. Non-Duplication of funding: Funding from multiple ESG or CoC sources may not be used to duplicate services to a project or person.
- B. Match: Recipients are responsible for assuring the provision of required match resources. Funded organizations are required to report the sources of match annually. These resources are verified through annual review.
- C. Gage expenditures: Agencies shall run quarterly expenditure reports to assure project spending is on target and not over spent, leaving a gap in service or underspent-leaving money on the table.

### Program Description for each Component

Participating Programs and members of the Northwest Continuum of Care that are required to utilize the NWCoC Coordinated Entry System will administer programs as aligned with the following description for each component type.

The goal for participating programs and members of the Northwest Continuum of Care is to divert and rapidly resolve homelessness in the region. Diversion and rapid resolution are further defined as any activity or program designated to rapidly end a household's homelessness. This may include rent and utility subsidies, supportive services, housing navigation, mediation services, education, and case management as determined by program funding sources.

Note: Eligibility Criteria may be further defined by certain program funders.

Supportive services may include, but are not limited to:

- Annual assessment of service needs

- Assistance with moving costs
- Case management
- Child care operations or vouchers
- Education services
- Employment assistance and job training
- Food (meals or groceries for program participants)
- Housing search and counseling
- Legal services
- Life skills training
- Moving costs
- Outpatient health services
- Outreach services
- Outpatient substance abuse treatment services
- Safe sleeping
- Transportation
- Utility deposits

Note: The following are the baseline policies for programs operating in the NWCoC. Programs are also required to ensure they are meeting the expectations of the program components outlined by their funding source. The NWCoC has attempted to align CoC policy and expectations with the respective funded programs. In the event a CoC policy does not align with a funded policy the program should follow the stricter policy.

**Emergency Shelter Programs**

| <b>Domestic Violence Shelter (OJP)</b>   |  |   |
|--|--|---|
| <b>Description</b>   | <b>Essential Program Services</b>  | <b>Eligibility Criteria</b>   |
| Temporary housing or shelter and support for persons escaping violent or abusive situations. This includes emotional, financial, and verbal forms of domestic abuse. Includes linkage to services. | <ul style="list-style-type: none"> <li>● Short term Crisis shelter</li> <li>● DV related Advocacy and supportive services.</li> <li>● Referral for mainstream services and resources.</li> </ul> | <p>Persons seeking immediate shelter from violent or abusive situations.</p> <p>Victims of domestic violence.</p> |

| <b>Emergency Shelter (ESG)</b>                                     |  |  |
|--|--|--|
| <b>Description</b>   | <b>Essential Program Services</b>  | <b>Eligibility Criteria</b>  |
| Emergency Shelter activities are designed to increase the quantity | <p>Essential program elements may include:</p> <ul style="list-style-type: none"> <li>● Case Management</li> </ul> | Individuals and households who are defined as literally homeless and demonstrate |

|  |   |   |
|--|---|---|
| and quality of temporary shelters provided to homeless people, through the renovation of existing shelters or conversion of buildings to shelters, paying for the operating costs of shelters, and providing essential services. | <ul style="list-style-type: none"> <li>• Referral for mainstream services and resources.</li> </ul> | <p>need to gain stability in permanent housing.</p> <p>Individuals or families who are fleeing domestic violence.</p> |
|--|---|---|

| <b>Street Outreach (ESG)</b>   |   |  |
|--|---|--|
| <b>Description</b>   | <b>Essential Program Services</b>   | <b>Eligibility Criteria</b>  |
| Street Outreach activities are designed to meet the immediate needs of people experiencing homelessness in <b>unsheltered</b> locations by connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. | <p>Essential Services may include the following:</p> <ul style="list-style-type: none"> <li>• Engagement</li> <li>• Case Management</li> <li>• Emergency Health Services</li> <li>• Emergency Mental Health Services</li> <li>• Transportation</li> </ul> <p>Services for Special Populations</p> | <p>Individuals who are experiencing homelessness in unsheltered locations</p> <p>Individuals and households who are defined as literally homeless and demonstrate need to gain stability in permanent housing.</p> |

### **Prevention and Diversion Programs**

| <b>Homelessness Prevention: ESG</b>                                      |  |  |
|--|--|--|
| <b>Description</b>   | <b>Essential Program Services</b>  | <b>Eligibility Criteria</b>  |
| Activities or programs designed to prevent the incidence of homelessness | <ul style="list-style-type: none"> <li>• Security deposit</li> <li>• Short and medium-term rental assistance</li> <li>• Utility deposit and payments</li> <li>• Rent arrears and rental application fees</li> <li>• Advance payment of last month's rent</li> <li>• Case Management</li> </ul> | <p>Household must meet one of the following:</p> <ul style="list-style-type: none"> <li>• HUD's definition of "at risk of homelessness"</li> <li>• HUD's definition of "homeless"</li> <li>• Fleeing or attempting to flee Domestic Violence</li> <li>• Must pay 30% of income towards rent</li> </ul> |

|  |  |  |
|--|--|--|
|  | <ul style="list-style-type: none"> <li>• Housing stability plan-including housing search and placement</li> <li>• Connection to mainstream resources</li> <li>• Mediation, legal services, credit repair</li> <li>• Transitional housing planning</li> </ul> |  |
|--|--|--|

| Homeless Prevention: FHPAP  |   |   |
|---|---|---|
| Description   | Essential Program Services  | Eligibility Criteria  |
| <p><b>Activities or programs designed to prevent the incidence of homelessness.</b></p> | <ul style="list-style-type: none"> <li>• Short-term rent or utility subsidies to avoid eviction or utility termination;</li> <li>• Security deposits or first month's rent to help households move into a different apartment;</li> <li>• Mediation programs for landlord- tenant disputes;</li> <li>• Payments to prevent foreclosure on a home; and</li> <li>• Education and training services (financial literacy, life skills, tenant education)</li> <li>• Linkage to other services.</li> </ul> | <p>Individuals who are homeless and are</p> <ul style="list-style-type: none"> <li>• Within 21 days of eviction (written notice) or</li> <li>• Moved twice in a 6-month period</li> <li>• Must be at or below 200% of Federal Poverty Guidelines</li> </ul> |

### Transitional Housing

### Transitional Housing



| Description   | Essential Program Services  | Eligibility Criteria   |
|---|---|--|
| <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.</p> | <p>Transitional Housing projects can cover housing costs and accompanying supportive services for program participants for up to 24 months.</p> | <ul style="list-style-type: none"> <li>• Individuals and households who are defined as literally homeless and demonstrate need to gain stability in permanent housing.</li> <li>• For Non-CoC funded programs client may be eligible for TH that are at imminent risk of homelessness.</li> <li>• Fleeing or attempting to flee domestic violence</li> </ul> |

**Rapid Re-Housing**

| Rapid Re-Housing (ESG)   |   |   |
|--|---|---|
| Description  | Essential Program Services  | Eligibility Criteria  |
| <p>Rapid Re-housing activities are designed to move people experiencing literal homelessness into permanent housing as quickly as possible. Housing and services are limited to 24 months. Linkage to other mainstream services.</p> | <p>Component services to obtain and maintain housing consisting of:</p> <ul style="list-style-type: none"> <li>• Short-term and medium-term rental assistance,</li> <li>• Rental arrears, rental application fees, security deposits, advance payment of last month's rent,</li> <li>• Utility deposits and payments,</li> <li>• Costs associated with housing stability</li> <li>• Case management,</li> </ul> | <p>Individuals and households who are defined as literally homeless and demonstrate need to gain stability in permanent housing.</p> <p>Individual or Household meets has an annual income of below 30 percent of median household income for the area.</p> <p>Individuals or families who are fleeing domestic violence.</p> |

|  |   |  |
|--|---|--|
|  | <ul style="list-style-type: none"> <li>• Mediation, legal services, and credit repair.</li> <li>• Linkage to other services.</li> </ul> |  |
|--|---|--|

| Rapid Re-Housing (FHPAP)  |   |  |
|---|---|--|
| Description   | Essential Program Services  | Eligibility Criteria   |
| Rapid Re-housing's fundamental goal is to reduce the amount of time people spend homeless and is a Housing First intervention designed for households to quickly exit homelessness and return to permanent housing. Rapid re-housing assistance is typically tailored to the unique needs of the household. | <ul style="list-style-type: none"> <li>• Short to mid-term rental assistance</li> <li>• Housing navigation assistance</li> <li>• Case management and services</li> <li>• Rent payment and move-in assistance</li> </ul> | <p>Households must be: [BJ1][CB2]</p> <ul style="list-style-type: none"> <li>• At or below 200 percent of Federal Poverty Guidelines</li> <li>• A Minnesota resident or a household otherwise approved by Minnesota Housing</li> <li>• Be homeless or at imminent risk of homelessness and in need of services and/or financial assistance due to a housing crisis or fleeing or attempting to flee domestic violence</li> </ul> |

| Rapid Re-Housing (HUD CoC)   |  |   |
|--|--|---|
| Description  | Essential Program Services   | Eligibility Criteria  |
| RRH is permanent housing that provides short and medium-term tenant-based rental assistance and supportive services to households experiencing homelessness. | <ul style="list-style-type: none"> <li>• Housing identification</li> <li>• Rent and move-in assistance</li> <li>• Case management and supportive services</li> </ul> | <ul style="list-style-type: none"> <li>• Individuals and households who are defined as literally homeless and demonstrate need to gain stability in permanent housing or fleeing or attempting to flee domestic violence</li> </ul> |

### Rapid Re-Housing Joint (TH/RRH)

| Description  | Essential Program Services  | Eligibility Criteria   |
|--|---|--|
| <p>To provide a safe place for people to stay – transitional housing – with financial assistance and wrap around supportive services determined by program participants to help them move to permanent housing as quickly as possible.</p> | <ul style="list-style-type: none"> <li>• Leasing of a structure or units, and operating costs to provide transitional housing</li> <li>• Short- or medium-term tenant-based rental assistance on behalf of program participants in the rapid re-housing portion of the project</li> <li>• Supportive services for the entire project</li> <li>• HMIS for the entire project</li> <li>• Project administrative costs for the entire project</li> </ul> | <p>Individuals and households who are defined as literally homeless and demonstrate need to gain stability in permanent housing.</p> <p>Individuals or families who are fleeing domestic violence.</p> |

| <b>Rapid Re-Housing (HUD YHDP)</b>   |   |  |
|--|---|--|
| Description  | Essential Program Services  | Eligibility Criteria   |
| <p>To provide a safe place for people to stay – transitional housing – with financial assistance and wrap around supportive services determined by program participants to help them move to permanent housing as quickly as possible.</p> | <ul style="list-style-type: none"> <li>• Housing identification</li> <li>• Rent and move-in assistance</li> <li>• Case management and services</li> </ul> | <p>Must be no older than 24 years of age at project entry</p> <p>No age limit once housed.</p> <p>Individuals and households who are defined as literally homeless, or at imminent risk of homelessness and demonstrate need to gain stability in permanent housing.</p> |

|  |  |  |
|--|--|--|
|  |  |  |
|--|--|--|

**Permanent Housing**

| <b>Permanent Supportive Housing (HUD CoC)</b>   |  |   |
|---|--|---|
| <b>Description</b>  | <b>Essential Program Services</b>  | <b>Eligibility Criteria</b>   |
| <p>Permanent Supportive Housing (PSH) is permanent housing in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided to assist households with at least one member (adult or child) with a disability in achieving housing stability.</p> | <ul style="list-style-type: none"> <li>• Long-term rental assistance</li> <li>• Supportive services</li> </ul> | <ul style="list-style-type: none"> <li>• At least one member (adult or child) of household is disabled</li> <li>• Households defined as Literally Homeless</li> </ul> |

| <b>Permanent Supportive Housing (Other, State Programs)</b>  |   |   |
|--|---|---|
| <b>Description</b>   | <b>Essential Program Services</b>   | <b>Eligibility Criteria</b>   |
| <p>Long-term housing with supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting.</p> | <ul style="list-style-type: none"> <li>• Support services</li> <li>• Case management</li> <li>• Confirmation of residency</li> <li>• Linkage to mainstream and community resources</li> <li>• Other direct assistance</li> <li>• Rental assistance</li> </ul> | <p>Individuals who are homeless with high barriers and/or a verifiable disability.</p> <p>Funding will determine the category of homelessness for eligibility. At all times clients who are literally homeless will be prioritized.</p> |

| <b>Emergency Housing Voucher (HUD CoC)</b> |                                   |                             |
|--|-----------------------------------|-----------------------------|
| <b>Description</b>                         | <b>Essential Program Services</b> | <b>Eligibility Criteria</b> |
|  |                                   |                             |

|   |   |   |
|---|---|---|
| <p>Provides housing vouchers through Public Housing Authorities (PHAs) to assist people who are experiencing or at risk of experiencing homelessness; are fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless.</p> | <ul style="list-style-type: none"> <li>• Case Management</li> <li>• Referral for mainstream services and resources</li> <li>• Housing search assistance</li> <li>• Moving assistance</li> </ul> | <ul style="list-style-type: none"> <li>• HUD defined homelessness</li> <li>• At Risk of Homelessness</li> <li>• Individuals or families fleeing or attempting to flee, domestic violence</li> <li>• Individuals or families who are recently homeless, as determined by the CoC, including participants in rapid rehousing and permanent supportive housing.</li> </ul> |
|---|---|---|

### Program Referral Criteria

The Northwest Continuum of Care Coordinated Entry System Assessment Process is utilized to help target households to the appropriate housing component, however, provider expertise, program availability, program eligibility, and client choice also need to be considered when making referrals. If referrals are made or accepted outside of recommended range, agency must be able to document exception.

The NWCoC has adopted a strength-based and needs-based approach to determining eligibility. The CoC intends to prioritize limited resources for the most vulnerable while meeting the needs of clients and promoting their strength and resilience. This includes the use of Progressive Engagement and Housing First models to administer resources.

The following table breaks down the referral criteria for the NWCoC following the system developed for Coordinated Entry in conformance with 24 CFR 578, Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Final Rule published in Vol. 77 No.147 of the Federal Register on July 31, 2012.

The NWCoC does not “bucket” people into certain program types (i.e. TH or PSH). Clients are prioritized in accordance with the NWCoC Coordinated Entry System Procedure Manual using Case Conferencing and other determining factors.

The NWCoC referral process does not have separate criteria for household type. A household may be referred to one or more Program Components. (i.e. Emergency Shelter and Supportive Housing)

| Program Component for Referral | Use the following information to determine most appropriate referral | Outcome |
|--------------------------------|--|---------|
|--------------------------------|--|---------|

|   |  |  |
|---|--|--|
| <b>Emergency Shelter</b>  | Current Housing Situation                      | Literally Homeless or Fleeting DV  |
| <b>Mainstream Resources</b>   | Current Housing Situation                      | Client can remain in own housing and the housing is safe. (no threat of DV, or immediate harm to client wellbeing)   |
|   | How long can client remain in current housing? | Greater than 14 days   |
| <b>Prevention Resources</b>   | Current housing situation                      | Client is the leaseholder of an existing unit.   |
|   | How long can client remain in current housing? | Greater than 14 days. It may be appropriate to still refer someone to prevention resources if they may be evicted sooner to alleviate the loss of housing. It may also be most appropriate to complete steps to refer to more intensive housing support if it is unlikely the issue can be resolved. |
| <b>Diversion / Rapid Resolution Resources</b>   | Current Housing Situation                      | Client is homeless (MN or HUD) or fleeing DV   |
|   | How long can client remain in current housing? | Less than 14 days (no indication they are welcome to safely stay at residence as long as possible i.e. with friends or family)   |
|   | Estimated length of assistance.                | Less than 3 months.  |
| <b>Supportive Housing Services (PH, RRH, TH) Referred through Coordinated Entry Priority List</b> | Current Housing Situation                      | Client is homeless (MN or HUD) or fleeing DV   |
|   | How long can client remain in current housing? | Less than 14 days (no indication they are welcome to safely stay at residence as long as possible i.e. with friends or family)   |
|   | Estimated length of assistance.                | Greater than 3 months  |

**Determining & Prioritizing Resources**

All ESG and CoC-funded Transitional, Rapid-Rehousing and Permanent Supportive programs must adhere to the following criteria for determining eligibility and prioritizing resources. Programs are required to determine and document eligibility and priority status. Often third-party supporting documentation is required. Verification and documentation requirements need to align with the project funding source. Participating Programs and members of the Northwest Continuum of Care and that are required to utilize the NWCoC Coordinated Entry system will follow the following policies for prioritizing resources

### **Chronic Homeless Prioritization Policy**

While the Northwest MN Continuum of Care feels all persons who become homeless need and deserve a home, the Continuum feels priority should be given to those individuals who are both homeless and disabled, as they are at greatest risk for remaining homeless. When possible, all homeless providers, particularly those providing Permanent Supportive Housing, should give preference to persons who are at greatest risk.

This should be accomplished by the following:

1. Establish and maintain preference criteria in the regional Coordinated Assessment System that gives waitlist priority to persons/households who are both homeless and disabled and who meet the Chronic Homeless and/or Long-term Homeless Definition.
2. Include weighted priority in the system barriers assessment to give preference to persons/households who are both homeless and disabled and who meet the Chronic Homeless and/or Long-term Homeless Definition.
3. Prioritize the development and renewal of permanent supportive housing projects when issuing certificates of consistency and when ranking grant applications.
4. Evaluate programs for how well they serve persons who are both homeless and disabled, addressing any barriers that are preventing this population from being served.
5. All PSH programs receiving CoC funding shall be required to edit eligibility guidelines to give preference to persons/households who are both homeless and disabled and who meet the Chronic Homeless and/or Long-term Homeless Definition. Note: preference does not mean limiting beds to Chronic Homeless or Long-term Homeless, only giving priority to this population as beds become available.
6. As part of Coordinated Assessment, develop an outreach plan that includes increasing access for persons who are Chronic and Long-term Homeless. Outreach includes making a concerted effort to reach persons who meet the CH and LTH definition, particularly those who are literally homeless.

### **Veterans Preference**

Veteran households will be given preference for homeless supportive housing units, with all other eligibility and preference criteria being equal.

## Income Eligibility for ESG

The CoC Program does NOT have any minimum income eligibility for their funded projects.

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

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

Certain rules and requirements apply in determining income, as well as eligibility:

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

## Income Recertification

1. RRH (NON-COC)- Annual Re-certifications includes determination that the household is: 1). below 30% AML. 2). Remains at-risk of homelessness 3). Lacks the financial resources and support networks needed to remain in their housing without continued program rental subsidy or case management support. Conduct a 30-day check-in for continued eligibility for housing subsidy.



2. TH- Annual Re-certifications includes determination that the household is: 1). below 30% AMI (Non-CoC). 2). Remains at-risk of homelessness 3). Lacks the financial resources and support networks needed to remain in their housing without continued program rental subsidy or case management support. Conduct a 90-day check-in for continued eligibility for housing subsidy.
3. PSH / COC RRH - Annual Re-certifications includes determination that the household: 1) Remains at-risk of homelessness and 2) Lacks the financial resources and/or support networks needed to remain in their housing without continued program rental subsidy or case management support.
4. CH PSH Annual Re-certifications includes determination that the household: 1) Remains at-risk of homelessness; 2) Lacks the financial resources and support networks needed to remain in their housing without continued program rental subsidy or case management support; and 3) continues to qualify for disability status.

### Occupancy Charges and Rent

1. **Occupancy agreements and leases.** Recipients and subrecipients must have signed occupancy agreements or leases (or subleases) with program participants residing in housing.
2. **Calculation of occupancy charges.** Recipients and subrecipients are not required to impose occupancy charges on program participants as a condition of residing in the housing. However, if occupancy charges are imposed, they may not exceed the highest of:
  - a. 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);
  - b. 10 percent of the family's monthly income; or
  - c. 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.
  - d. Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant's income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.
3. **Resident rent.**
  - a. Amount of rent.

- i. Each program participant on whose behalf rental assistance payments are made must pay a contribution toward rent in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 U.S.C. 1437a(a)(1)).
  - 1. 30 percent of the family's monthly adjusted income;
  - 2. 10 percent of the family's monthly income; or
  - 3. if the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of such payments which is so designated
- ii. Income of program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). (2) Review. Recipients or subrecipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.
- b. Review. Recipients or subrecipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.
- c. Verification. As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants must provide the recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment.

### **Definitions**

Disabling condition is defined as: A Diagnosable substance use disorder - Serious mental illness, - Developmental disability, or chronic physical illness - Or disability including the co-occurrence of two or more of these conditions. A disabling condition limits an individual's ability to work or perform one or more activities of daily living.

HUD Chronic Homeless means:

(1) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(9\)](#)), who:

(i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

(ii) Has been homeless and living as described in paragraph (1)(i) of this definition continuously 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 in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

HUD Categories of Homelessness are defined as:

Category 1, Literally Homeless: Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided;

Category 2, Imminent Risk of Homelessness: Individuals and families who will imminently lose their primary nighttime residence;

Category 3, Homeless Under Other Federal Statutes: Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; and

Category 4, Fleeing/Attempting to Flee Domestic Violence: Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.

At Risk of Homelessness is defined as:

An individual or family, that the individual or family— (A) has income below 30 percent of median income for the geographic area; (B) has insufficient resources immediately available to attain housing stability; and (C) (i) has moved frequently because of

economic reasons; (ii) is living in the home of another because of economic hardship; (iii) has been notified that their right to occupy their current housing or living situation will be terminated; (iv) lives in a hotel or motel; (v) lives in severely overcrowded housing; (vi) is exiting an institution; or (vii) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness. Such term includes all families with children and youth defined as homeless under other Federal statutes.

Term of rental assistance are defined as:

For further definition of rental assistance terms: short-term rental assistance is up to 3 months, medium-term rental assistance is 4-24 months and long-term rental assistance is 24 months or longer.

Short-term: up to 3 months

Medium-term: 4 to 24 months

Long-term: 24 months or longer

### **Coordinated Entry**

The Northwest Continuum of Care (NWCOC) will administer a Coordinated Assessment in accordance with the adopted NWCoC CES Policy Manual and Procedure Manual.

### **School Enrollment and Connection to Appropriate Services for All Children Policy**

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

### **Family Separation Policy in Emergency Shelter and Transitional Housing**

HUD issued regulations that all ESG funded shelters and transitional housing programs are prohibited from denying access to families based on the age of child. Non-compliance may result in the removal of ESG funds. The CoC has expanded this policy to include any shelter or TH program participating in CES. Specific details include:

Any project sponsor receiving funds under this title to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18 shall not deny admission to any family based on the age of any child under age 18.

Notwithstanding the requirement under subsection (a), project sponsors of transitional housing receiving funds under this title may target transitional housing resources to families with children of a specific age only if the project sponsor— “(1) operates a transitional housing program that has a primary purpose of implementing an evidence-based practice that requires that housing units be targeted to families with children in a specific age group; and “(2) provides such assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured

### **Emergency Transfer Planning Policy**

The CoC will comply with 24 CFR 5.2005(e) for families receiving tenant based rental assistance. If a family separates, the member or members of the household who will need to move out will retain their homelessness eligibility status. If a unit is unavailable, the family member or members will be prioritized for the next available opening.

In accordance with the Violence Against Women Act (VAWA), the CoC allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant’s current unit to another unit in the event the client is concerned for their safety in the current unit.

### **Low Barrier Policy**

CoC providers will make enrollment determinations on the basis of limiting barriers to enrollment in services and housing. No client may be turned away from crisis response services or homeless-designated housing due to lack of income, lack of employment, disability status, or substance use unless the project’s primary funder requires the exclusion or a previously existing and documented neighborhood covenant/good neighbor agreement has explicitly limited enrollment to clients with a specific set of attributes or characteristics. Funders restricting access to projects based on specific client attributes or characteristics will need to provide documentation to the CoC providing a justification for their enrollment policy. CoC projects offering Prevention and/or Short-Term Rapid Rehousing assistance (i.e. 0 – 6 months of financial assistance) may choose to apply some income standards for their enrollment determinations.

### **Coordination of Services Policy**

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

### **Component services include:**

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

### **Policy Amendments**

This policy document, approved by the Northwest Continuum of Care (NWCoC) Board of Directors, will serve as the guiding document for the administration of all CoC, ESG, and other participating programs of the NWCoC. All revisions of this document will be outlined in the following table. The signature of the Board Chair will match or occur after the date of the approved revision.

| Version | Date Released | Key Changes |
|---------|---------------|-------------|
| 2.0     | 01/19/2023    | N/A         |

|  |  |  |
|--|--|--|
|  |  |  |
|  |  |  |

### Signatures

As Chair of the NWCoC Board of Directors I attest that this Policy Manual was approved by vote in accordance with the requirements governance structure approved by the NWCoC.

Chair of the NWCoC Board of Directors

Lori Wollman

---

### Signature

*Lori R Wollman*

---

### Date

01/25/2023

---