Missouri Balance of State
Continuum of Care

WRITTEN STANDARDS FOR HOMELESSNESS ASSISTANCE PROGRAMS

Missouri Balance of State Continuum of Care

Abstract

The MO BoS CoC has hereby adopted the following Program standards for all CoC/ESG funded Housing programs to ensure: Program accountability to individuals and families experiencing homelessness, program compliance with HUD rules, program uniformity, adequate program staff competence and training, specific to the target population being served

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Introduction

The Missouri Balance of State Continuum of Care (MO BoS CoC) is responsible for coordinating and implementing a system-wide approach that meets the needs of the populations and subpopulations experiencing homelessness within the geographical areas of the 101 CoC counties. Both the Emergency Solution Grant (ESG) Rules and Regulations and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) CoC Program Interim Rules state that CoCs, in consultation with recipients of ESG program funds within the geographic area, must:

- Establish and consistently follow community standards for providing assistance
- Establish performance targets appropriate for population and program type;
- Monitor recipient and sub-recipient performance.

In accordance with Title 24 of the Code of Federal Regulations (24 CFR) Part 578, the Missouri Balance of State Continuum of Care has developed the following written standards. These standards apply to all projects that receive HUD CoC/ESG funds. The goal of this document is to synthesize key elements of the HUD regulations with the processes and priorities of the MO BoS CoC to ensure that the CoC programs are administered fairly and deliberately.

This document aims to ensure:

- Program accountability to individuals and families experiencing homelessness
- Program compliance with HUD rules
- Program uniformity
- Adequate program staff competence and training, specific to the target population being served

All programs that receive CoC and ESG funding are required to abide by the written standards outlined in this document for service delivery. Programs that receive other funds, such as MOHIP and MHTF, are encouraged to follow the standards in this document. Programs should reflect our CoC's values, as well as comply with HUD requirements, in their design and practices.



Guiding Principles

Housing First- an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

Person-Centered Services- are operationalized by ensuring programs are flexible and able to address the unique needs and strengths of all people with whom they work. These principles inform all the policy and procedural standards in this document. By centering the experiences of the people being served, programs ensure maximum impact and reduction of harm. It is the expectation of the CoC that these values are integrated in program operations and are intentionally part of the operational design of services and interventions.



Definitions

- **Agencies/organizations:** Members of the MO BoS CoC that offer homeless support services
- **CoC Program Notice of Funding Opportunity (NOFO)**: The NOFO refers to a process that informs the public that funding is available for a specific purpose and can be requested through an application process.
- **Coordinated Entry System (CES)**: a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs
- **Emergency Shelter (ES)**: Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless, and that does not require occupants to sign leases or occupancy agreements.
- **Family:** includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. 24 CFR 5.403. Per CoC requirements, fair housing and equal opportunity of clients set forth in 24 CFR 5.105 (a) are applicable, including: prohibition against involuntary family separation and nondiscrimination requirements. 24 CFR 578.93
- **Geographic Mobility (for CoC funded programs only):** Per CoC Program Interim Rule Amendment to § 578.51(c), "Allows individuals and families to choose housing outside of a CoC's geographic area, subject to certain conditions, and to retain the tenant-based rental assistance under the CoC program."
- **Homeless:** For the purposes of CoC assistance, individuals and families may be defined as homeless under any of the four categories included in the Homeless Definition Final Rule:
    - Category 1- Literally homeless.
    - Category 2- Imminently losing their primary night-time residence.
    - Category 3- 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 are defined as homeless under other Federal statute and meet additional specified criteria. Note: For CoC assistance to be provided to persons defined as homeless under Category 3, the project must be located within the geographic area of a CoC that has received HUD approval to serve this population. *The MO BoS CoC has not received HUD approval to serve this population.*



- Category 4- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions.
- Chronically Homeless- 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:
  - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and has been homeless and living as described above continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in a plane not meant for human habitation.
- At Risk of Homelessness-An individual or family who:
  - Has an annual income below 30% of median family income for the area; and 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; and meets one of the following conditions: has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR is living in the home of another because of economic hardship; OR 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; OR 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; OR 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; OR is exiting a publicly funded institution or system of care.

- **Homeless Management information System (HMIS):** The information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness. 24 CFR 576.2/578.3
- **Housing First**: A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing and does not have service





participation requirements or preconditions for entry (such as sobriety or a minimum income threshold).

- **HUD**: The Department of Housing and Urban Development; its primary mission is improving affordable homeownership opportunities to support the housing market and homeownership.HUD's programs are geared toward increasing safe and affordable rental options, reducing chronic homelessness, fighting housing discrimination by ensuring equal opportunity in the rental and purchase markets, and supporting vulnerable populations.
- **Joint Transitional Housing and Rapid Re-Housing (Joint TH-RRH):** a project type that includes two existing program components —TH and RRH—in a single project to serve individuals and families experiencing homelessness.
- **Participant**: Individual or household that is enrolled in a CoC- or ESG-funded program.
- **Permanent Supportive Housing (PSH):** An intensive, best practice intervention for addressing homelessness that combines permanent, subsidized housing with voluntary, wraparound supportive services for populations with disabilities and the most significant needs.
- **Rapid Re-Housing (RRH)**: A program designed to help individuals and families exit homelessness as quickly as possible, move to permanent housing, and achieve stability in that housing.
- **Transitional Housing (TH)**: Temporary housing for participants who have signed a lease or occupancy agreement with the purpose to transition households experiencing homelessness into permanent housing within 24 months.



General Program Expectations

CoC Structure and Collaboration

In the Missouri Balance of State Continuum of Care, CPSEMO is the designated Lead Agency. The Lead Agency team, as staffed by CPSEMO, is responsible for working with the CoC Board of Directors, regions, committees, and organizations to foster connection, communication and execution of expectations/policy.

The Missouri Balance of State (MO BoS CoC) collaborates with partners on many levels including local city leadership and statewide entities. The structure of the CoC provides engagement opportunities from individual participant resources to systemic engagement. Regions and committees meet regularly to ensure successful networking, policy/updates, and case conferencing. The CoC Board of Directors also meets monthly to discuss, review, and approve changes or new policies recommended by committee/Lead Agency/HMIS Lead. The CoC continuously works to incorporate the expertise of persons with lived experience of homelessness in our decision making structure. Organizations are encouraged to speak into the local community about their impact and to inform community partner organizations of programmatic changes that could affect providers and clients. Stakeholder participation at each level of the CoC should be supported by all members of the MO BoS CoC.

Personnel Expectations

The CoC programs should be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

- The program provides training to all paid and volunteer staff on both the policies and procedures employed by the program and on specific skill areas as determined by the program.
- All paid and volunteer service staff participate in ongoing and/or external training and development to further enhance their knowledge and ability to work with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
- For programs that use HMIS or a Comparable Database, all users must abide by the standard operating procedures found in the HMIS/Comparable Database Policies and Procedures manual provided by the HMIS/Comparable Database vendor. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
- All staff have a written job description that at a minimum addresses the major tasks to be performed and the qualifications required for the position.
- The program operates under an affirmative action/civil rights compliance plan or letters of assurance.

- Agency staff review current cases and individual service plans on a regular and consistent basis to ensure quality/coordinated services.

Coordinated Entry

Coordinated Entry is a shared, community-wide intake process intended to match all households experiencing homelessness with the community resources that are best able to resolve their housing crisis.

HUD requires each Continuum of Care (CoC) to establish and operate a coordinated entry process with the goal of increasing the efficiency of the local homelessness crisis response systems and improving fairness and ease of access to resources, including mainstream resources, for all persons experiencing homelessness. A coordinated entry system should provide information to CoC members and stakeholders about needs and gaps in the community to help strategically allocate housing and stabilization resources using focused interventions that are proven to end homelessness.

Programs will be active members in the Coordinated Entry system. Programs will have minimal entry requirements to ensure the most vulnerable of the population are being served. Programs will assist participants in locating safe, affordable housing that meets participants' needs in accordance with client intake practices and within CoC guidelines.

The policies and procedures that govern the Missouri Balance of State Continuum of Care's Coordinated Entry system are located within the Coordinated Entry Written Standards. Projects receiving CoC and/or ESG funding must ensure compliance with the Coordinated Entry Written Standards.

Prioritization

Programs will prioritize which eligible families and individuals will receive program assistance. Each program will prioritize each applicant/household using the CoC Coordinated Entry process. Each prioritization is made according to program priority expectations, established in accordance with 24 CFR 576.400(e) and 24 CFR 578.7(a) (9). The order of priority is established at a CoC wide level; however a program's eligibility requirements (as outlined in their grant agreement) will take precedence.

To ensure full geographic coverage, maximize client choice, and serve the most vulnerable, there is one BoS CoC wide prioritization list that is to be sortable by the designated regional list holder as agreed upon by the Regional CE Committee. The prioritization list should not be considered a "waitlist". It is a goal of the MO BoS CoC CES to house all households within 60 days or less. Programs should actively identify resources for those households with the highest needs and most vulnerable, and make referrals to resources available.

Participation Expectations

The policies and procedures that govern the MO BoS CoC's Coordinated Entry system are located within the Coordinated Entry Written Standards. Projects receiving CoC and/or ESG funding must ensure compliance with the Coordinated Entry Written Standards.

Diversion

All clients presenting to CES should be screened for Prevention/Diversion and referred to appropriate services. Agencies who have prevention/diversion resources are expected to collaborate with community partners to assist as many clients as possible. If the agency has funding available for prevention/diversion and the client is eligible, follow the prioritization steps as listed in the MO BoS CoC CE Written Standards.

Termination of Services for CES

For Coordinated Entry Termination, refer to the Termination section of CES Written Standards.

Grievance Policy

In the event a participant does not agree with or believes discrimination occurred during any part of the Coordinated Entry System process, the participant has a right to file a grievance. Grievances will be processed in such a way in which complaints are addressed in the most objective and fair way; including a process by which the agency involved in the grievance does not participate in the decision-making regarding the outcome of the grievance. Grievances will be handled through a tiered approach, deferring to the Regional Coordinated Entry Committee first. If the grievance cannot be resolved, then the issue will move to the BoS CoC Coordinated Entry Committee. Finally, grievance concerns can be appealed to the BoS CoC Board for resolution, if not resolved by the BoS CoC CE Committee.

Housing Management Information System (HMIS)

Explanation and Purpose

The purpose of a Homeless Management Information System (HMIS) is to collect, organize, and utilize private, sensitive, and confidential information of the homeless population. Information that is collected by the HMIS helps provide an accurate count of the homeless population, track the patterns of services used, as well as the locations of populations and services. This data is used to evaluate the effectiveness of services and to analyze where funding would be most appropriate.

The Missouri Balance of State Continuum of Care designates an independent agency to serve as the HMIS lead. Our designated HMIS agency is The Institute for Community Alliances (ICA). ICA is responsible for maintaining the HMIS database,

equipping CoC end users with access, and training as necessary to collect HUD required information for project participants. As per Agency Agreement, our HMIS agency provides support for CoC data needs and reporting obligations to HUD.

Data collected from assessment must be entered into HMIS within three days of obtaining information to meet the CoC's standards for data entry.

Project Participation

Through the HMIS agency (ICA), any agency that provides shelter, housing, and services to individuals experiencing homelessness and those at risk of homelessness qualifies to participate in HMIS. Agencies may request permission to participate in HMIS and become a Partner Agency by contacting the Institute for Community Alliances.
Email contact: MOHMIS@icalliances.org
ICA reference site for HMIS processes: https://icamissouri.helpscoutdocs.com

Participant Choice

Programs should support participants with options regarding location and type of housing, when possible/practical. Participants should also be provided with a choice of roommates, when applicable. Participant rejection of a housing program's option should not exclude them from housing. In assessments, participant and assessor comfort/safety may dictate how/when/where the assessment is completed. Participants should be made aware of service eligibility time limits and are provided available resources.

Emergency Transfer Plan

In accordance with the Violence Against Women Act (VAWA), MO BoS CoC allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's unit to another. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of the BoS CoC's funded agencies to honor such request for tenants receiving assistance may depend upon a determination that the tenant is a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the funded agency has another unit that is available and safe to offer the tenant.

Participant Eligibility and Recordkeeping

Programs must follow the eligibility requirements for their funding streams. As set forth in the HEARTH Act, there are four categories of participant eligibility:1) literally homeless; 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes (subject to cap), (4) Fleeing/Attempting to Flee Domestic Violence, Chronically Homeless and At Risk of Homelessness. If the provider is using anything other than a Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

The MO BoS CoC serves categories 1, 2 and 4 through its CoC/ESG programs. Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- **Category 1- Literally homeless**:
  - Eligibility should be documented in the following manner (in order of preference):
    - Third party verification (HMIS print-out, or written referral/certification by another housing or service provider; or
    - Written observation by an outreach worker)
    - Certification by the individual or head of household seeking assistance stating that s/he was living on the streets or in shelter
  - For individuals exiting an institution, one of the forms of evidence above and:
    - Discharge paperwork or written/oral referral, or
    - Written record of intake worker's due diligence to obtain evidence and certification by individuals that they exited the institution.
- **Category 2- Imminent Risk of Homelessness:**
  - A court order resulting from an eviction action notifying the individual or family that they must leave; or
  - A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
  - Certification that no subsequent residence has been identified; and
  - Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanence housing
- **Category 3**- Not Applicable
- **Category 4- Fleeing or Attempting to flee DV:**
  - For victim service providers:
    - 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
  - For non-victim service providers:
    - 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; and



- Certification by the individual or head of household that no subsequent residence has been identified; and
- Self-certification , or other written documentation, that the individual or family lacks the financial resources and support networks to obtain permanent housing.

- **Chronically Homeless-**
  - Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
  - Written observation by an outreach worker; or
  - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter.

Recordkeeping Expectations

- Records must include all information required by HUD (and other funders), homelessness documentation, housing stabilization plans, and case notes.
- Data must be entered into HMIS or a comparable database in accordance with data policies provided by the lead agency.
- Information collected from clients should be protected and not released without written permission of the participant as appropriate.
- Records pertaining to CoC funds or following CoC standards must be retained for 5 years after the end of the grant period from which the participant was served.
- Digital and physical copies made from original documents may be substituted for original records.
- Other funding sources may have direct policies regarding documentation that agencies are expected to follow.
- Records will be made available to the CoC lead agency during program monitoring visits.

Performance Review

The MO BoS CoC evaluates performance of all projects entering data into the MO BoS CoC Homeless Management Information System (HMIS) and intends to include data from projects using comparable databases in the future. Projects are expected to conduct frequent reviews of project performance, data quality, and data timeliness to ensure all HMIS is complete and accurate. The MO BoS CoC will notify project staff when the project does not meet the performance standards established by the MO BoS CoC. Refer to Performance Improvement Policy for more information.



Best Practice Resources

- Housing First- a client-focused and low barrier approach as well as easy access for all populations, no matter where or how participants present.
- Equity-focused Inclusivity- People of color experience homelessness at a disproportionately high rate due to historic and ongoing systemic racism. The CoC is working to ensure that representation, treatment, and outcomes among all populations are as fair and equitable as possible.
- Personnel Expectations- The program shall be adequately staffed by qualified personnel to ensure quality service, effective program management, and safety of the participants.
- Training and Education- The MO BoS CoC provides annual training that is available online through the Litmos platform. Training is available for Coordinated Entry and CoC membership requirements.
- Supportive/Wraparound services- While it is not mandatory for programs to provide additional services, the expectation is that agencies will provide best services available for the participant. Agencies will not be reprimanded for not addressing all client needs, however the agencies should case manage participants until they are no longer in need of supportive services.
- Trauma Informed Care- Trauma Informed Care is an overarching structure and treatment attitude that emphasizes understanding, compassion, and responding to the effects of all types of trauma. Trauma Informed Care also looks at physical, psychological, and emotional safety for both clients and providers, and provides tools to empower individuals on the pathway to stability.

Participant-Centered Practices:

- Motivational Interviewing- "A client-centered, directive method for enhancing intrinsic motivation to change by exploring and resolving ambivalence. It is a way to help people talk themselves into changing."
- Strength Based- " An approach that focuses on the positive qualities of the people we work alongside, the organization and the local community. Rather than addressing the 'problems' of the individuals, we look to know the person as a whole to identify strengths and goals to work towards."
- Progressive Engagement- " An approach to helping households end their homelessnes as rapidly as possible, despite barriers, with minimal financial and support resources."

STANDARDS FOR ADMINISTERING ASSISTANCE

The following programs fall under CoC & ESG guidance. Each program section will have the following subsections:

Eligibility and Prioritization

- This explains the program's eligibility requirements per grant agreement/HUD requirements/Coordinated Entry Written Standards.
- Some projects may have specific populations they serve based on funding provided, i.e. clients of Veteran status, youth, victims of domestic violence, etc.)

Program Standards

- This describes the program specific standards to be adhered to, including: time frame, assistance limits, rental standards, HUD & HMIS criteria, & CoC standards of program operation.

Termination

- Programs may have different termination policies. Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination. Each program will provide the program participant with a written copy of the program rules and the termination & grievance policies at client intake, before the participant begins to receive assistance.



Rapid Re-Housing (RRH)

Eligibility and Prioritization

- For Rapid Rehousing relevant homeless categories for COC are: Category 1, 2 & 4. For ESG, relevant homeless categories are Category 1 and 4 (only if literally homeless).
- The program will prioritize each applicant household using the CoC Coordinated Entry process, and any internal program priorities as set forth in the original or amended CoC program application.

Program Standards

Client Intake

- The program will be an active member in the Coordinated Entry system. The program will have minimal entry requirements to ensure the most vulnerable of the population are being served. The program will assist participants in locating safe, affordable housing that meets participants' needs in accordance with client intake practices and within CoC guidelines for Rapid Re-Housing Programs.
- Programs cannot disqualify an individual or family because of evictions or poor rental history, criminal history, credit history, lack of financial resources, or a history of domestic violence.
- The program explains the services that are available and the expectations for participation. A copy of the program expectations and termination and grievance policies are given to the household prior to program entry.
- The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants will be offered copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.

Program Operations

The program will assist participants in locating and stabilizing in safe, affordable housing that meets participants' needs.

- In assisting in locating housing, the program considers the needs of the individual or family experiencing homelessness. Program participants (of CoC funded programs only) may choose housing outside of the CoC's geographic area if the program agency staff have the capacity to meet rent and service assistance requirements outlined in the CoC Interim Rule. 24 CFR 578.51(c)(4)
- CoC Programs will assess potential housing for compliance with HUD Housing Quality Standards, lead-based paint, and rent reasonableness standards (based on comparable units in the same zip code) prior to the participant signing a lease with the landlord.





- ESG funded programs will assess potential housing for compliance with ESG Minimum Habitability Standards, rent reasonableness and Fair Market Rent (FMR) standards prior to the participants signing a lease with a landlord.
- The program provides assistance in accessing suitable housing through landlord engagement and housing search services.
- CoC funded programs may provide assistance in accordance with 24 CFR 578.51 and 578.53.
    - Eligible Rental Assistance costs may include security deposits (up to 2 months), short and/or medium term tenant based rental assistance, last month's rent (when paid with a deposit and 1 st month's rent), up to one month in vacancy payments, and up to one month's rent in damages.
    - Eligible Supportive Services assistance costs may include utility deposits, rental application fees, childcare, food, education services, case management, public transportation, housing & relocation services,credit repair, and legal services related to obtaining or retaining permanent housing.
- Ineligible costs under CoC Rapid Re-Housing include:
    - Utility Payments for utilities not included in Tenant Based Rental Assistance
    - Utility and/or Rental Arrears
    - Operating Costs (cannot be combined with Rental Assistance)
- ESG funded programs may provide assistance in accordance with 24 CFR § 576.105.
    - Eligible financial assistance costs, subject to general conditions under § 576.103 and § 576.104, ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs: rental application fees, security deposits, last month's rent, utility deposits, utility payments, moving costs, and service costs.
- The program participant must sign a legally binding written lease for a term of at least one year that is renewable (for a minimum term of one month), and terminable only for cause, with the landlord which must include a lease provision or addendum that includes all requirements that apply to tenants, the owner, or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking)
- The program staff and the participant should work together to develop a housing stabilization plan, which may include financial goals, periods and amounts of assistance, meeting schedules, employment goals, and a program exit strategy.
- Assistance will be tailored to individual client needs in order to reach housing stabilization. This includes evaluating on an individual client basis the length of time rent and supportive services will be provided. The CoC recommends that programs should not limit the amount of time households may receive



assistance outside of the 24 month standard set by HUD, to ensure long-term housing stability.

- The CoC does not require programs to require that program participants share in the cost of their rental assistance. If the agency requires rent cost sharing, the agency must have standards for client income contribution to rent. If an agency has income contribution standards they must apply to all program participants equally; for the purposes of calculating rent contributions, the rent shall equal the total monthly unit rent and, if the tenant pays separately for utilities, the monthly utility allowance set by the local PHA. HUD regulations do not require clients to contribute any portion of income to rent when providing Rapid Re-Housing assistance.
- Individual case management is required at least monthly. 24 CFR 578.37(F) Housing Stability Case Management assists participants in locating and obtaining suitable permanent housing, which may include:
    - Assessment of housing barriers, needs, and preferences
    - Development of an action plan for locating housing
    - Housing search
    - Outreach to and negotiation with owners
    - Tenant support and/or counseling
    - Assessment of housing for compliance with CoC requirements for housing quality standards, lead- based paint, and rent reasonableness
    - Assistance with submitting rental applications
    - Understanding leases
    - Arranging for utilities
    - Making moving arrangements
    - Monthly documented contacts with RRH participants.
- Ongoing Case Management services include assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who has obtained permanent housing through the Rapid Re-Housing program by:
    - Developing an individualized housing and service plan, including planning a path to permanent housing stability
    - Developing, securing, and coordinating services
    - Obtaining Federal, State, and local benefits
    - Monitoring and evaluating program participant progress
    - Providing information about, and referrals to, other providers
    - Conducting annual re-evaluations to determine on-going program eligibility and document lack of sufficient resources to retain housing with CoC assistance
- Other eligible services may be provided including:
    - Legal Services to resolve a legal problem that prohibits a program participant from obtaining or retaining permanent housing, including:
        - Client intake
        - Preparation of cases for trial

        - Provision of legal advice
        - Representation at hearings
        - Counseling
        - Filing fees and other necessary court costs
    - Mediation between the program participant and the owner or person(s) with whom the participant is living;
    - Credit Repair, including:
        - Credit counseling
        - Accessing a free personal credit report
        - Resolving personal credit problems
- ESG funded programs are limited to the costs above; however, CoC funded programs may also include applicable services as listed in 24 CFR 578.53.
- The program must re-evaluate the household for continued eligibility a minimum of every 12 months. To continue to receive Rapid Re-Housing assistance, the household must demonstrate:
    - Lack of resources and support networks. The household must continue to lack sufficient resources and support networks to retain housing without program assistance.
    - Need. The program must determine the amount and type of assistance that the household needs/wants to (re)gain stability in permanent housing.
    - For ESG funded programs participant income must be less than or equal to 30% of Area Median Income (AMI)
- Limitation on Case Management & Supportive Services
    - CoC funded supportive service programs may provide for no more than 6 months after rental assistance stops. 24 CFR 578.37(D)
    - ESG funded programs may provide supportive services for 30 days while the participant is seeking housing and for 24 months while the participant is living in housing. 24 CFR 576.105 (2)

Service Coordination

The program may assist program participants, pursuant to 24 CFR 578.53, in attempting to obtain appropriate supportive services and other Federal, State, local, and private assistance available for such individuals as needed and requested by the household. Staff should be knowledgeable about mainstream programs and services in the community.

- Arrangements shall be made as appropriate and available with community agencies and individuals for the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; chemical dependency assessments and treatment; legal services; budgeting and credit repair; and other assistance requested by the participant, which are not provided directly by the program.
- Other homeless and mainstream resources for which, if eligible, a client may be assisted in obtaining, include: Emergency Financial

Assistance; domestic violence shelters; local Housing Authorities, public housing, rent subsidies and subsidized housing; temporary labor agencies; childcare resources and public programs that subsidize childcare; consumer credit counseling service agencies; youth development and child welfare; Community Support Programs; WIC; SNAP; Unemployment Insurance; Social Security benefits; Medicaid/Medicare.

Follow-up Services

The program shall attempt to provide a continuity of services as necessary to all participants following their exit from the program. These services can be provided directly and/or through referrals to other agencies or individuals.

- The program develops exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
- It is recommended that a program attempt to follow up with phone or written contact at least once per month for six months after the client exits the program, having received their final month of rental assistance. A program may provide follow-up services that include identification of additional needs and referral to other agency or community resources in order to prevent future episodes of homelessness.
- Participants may receive a maximum of 6 months of supportive services after the final rental assistance is provided to the household.

Termination

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

- In terminating assistance to a program participant, the agency must follow the due process provisions set forth in 24 CFR 578.91, as well as the following process:
  1. Providing the program participant with a written copy of the program rules and the termination & grievance policies at client intake, before the participant begins to receive assistance;
  2. Written notice to the program participant containing a clear statement of the reason for termination;
  3. Providing a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and providing
  4. Prompt written notice of the final decision to the program participant.
- Termination under this section does not bar the program from providing further assistance at a later date to the same individual or family.



- Programs are encouraged to re-house, rather than terminate assistance to households that are evicted from their housing while participating in the Rapid Re-Housing program.
- Programs are encouraged to attempt to transfer clients to another Rapid Re-Housing program within the CoC if termination cannot be avoided. For information, refer to the Project to Project Transfers Section of the Coordinated Entry Written Standards.



Permanent Supportive Housing (PSH)

Eligibility and Prioritization

All Program participants must meet the following program eligibility requirements:

- The household must meet category 1 of the homeless definition, set forth by HUD in 24 CFR 578.37, and any other requirements of the NOFO from the year in which the project was funded.
- The program will prioritize each applicant household using the CoC Coordinated Entry process, and any internal program priorities as set forth in the original or amended CoC program application;
    - Participants will be referred from Coordinated Entry utilizing the CoC adopted Order of Priority for PSH.

Program Standards

Client Intake

- The program will be an active member in the Coordinated Entry system. The program will have minimal entry requirements to ensure the most vulnerable of the population are being served. The program will assist participants in accordance with client intake practices and within CoC guidelines for PSH Programs.
- Programs cannot disqualify an individual or family because of evictions or poor rental history,criminal history, credit history, lack of financial resources, or a history of domestic violence.
- The program explains the services that are available and the expectations for participation. A copy of the program expectations and termination and grievance policies are given to the household prior to program entry.
- The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants will be offered copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.

Program Operation

- The program will assist participants in locating and stabilizing in safe, affordable housing that meets participants' needs.
    - In assisting in locating housing, the program considers the needs of the individual or family experiencing homelessness. Program participants may choose housing outside of the CoC's geographic area if the program agency staff have the capacity to meet rent and service assistance requirements outlined in the CoC Interim Rule. 24 CFR 578.51(c)(4)
    - Programs will assess potential housing for compliance with HUD Housing Quality Standards, lead-based paint, rent reasonableness standards (based on comparable units in the same zip code), and Fair Market Rent (FMR)(as applicable) prior to the participant signing a



lease with the landlord for rental assistance, and prior to the agency signing a lease with the landlord for leasing assistance.

- The program provides assistance in accessing suitable housing through landlord engagement and housing search services for tenant based rental assistance and scattered site leasing; the program provides assistance with landlord mediation and housing support services for project based leasing.
- The program may provide assistance in accordance with 24 CFR 578.49, 578.51 and/or 578.53, dependent upon the eligible approved costs & project type in the original project application and grant agreement.
    - Eligible Leasing costs under 24 CFR 578.49 may include, where the recipient or subrecipient is leasing the structure, or portions thereof, paying 100% of the costs of leasing a structure or structures, or portions thereof, to provide housing or supportive services for up to 3 years. If included in the rent, gas, electric and water may be paid with leasing funds. If paid separate from rent, utilities are an operating cost. If paid separate from rent for supportive services facilities, utilities are a supportive services cost. Leasing funds may pay for security deposits up to two times the rent amount, and last month's rent when paid with the deposit and first month's rent.
    - Eligible Rental Assistance costs under 24 CFR 578.51 may include security deposits (up to 2 months), short and/or medium term tenant based rental assistance, last month's rent (when paid with a deposit and 1 st month's rent), up to one month in vacancy payments, and up to one month's rent in damages.
    - Eligible Supportive Services assistance costs under 24 CFR 578.53 may include utility deposits, rental application fees, childcare, food, education services, case management, public transportation, housing & relocation services, credit repair, and legal services related to obtaining or retaining permanent housing.
- Ineligible costs under CoC PSH include:
    - Leasing funds may not be used to lease units or structures owned by the recipient, sub-recipient, parent organization, or related organizations, unless HUD authorized an exception for good cause.
    - Leasing funds may not pay for unit damages; these are an eligible maintenance cost under Operating.
    - Hotel/Motel vouchers are not an eligible CoC program cost
    - Utility Payments for utilities not included in Tenant Based Rental Assistance





  - Utility and/or Rental Arrears
  - Operating Costs combined with Rental Assistance (Leasing may utilize operating)
- For rental assistance PSH, the program participant must sign a legally binding written lease for a term of at least one year that is renewable (for a minimum term of one month), and terminable only for cause, with the landlord which must include a lease provision or addendum that includes all requirements that apply to tenants, the owner, or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking).
- For Leasing PSH, the agency must follow the same guidelines, and issue a sub-lease or occupancy agreement with the client.Leasing does not allow for leases directly between the tenant and landlord. 24 CFR 578.77
- The program staff and the participant should work together to develop a housing stabilization plan, which may include financial goals, meeting schedules, employment goals, and a long-term program exit strategy.
- Assistance will be tailored to individual client needs in order to reach housing stabilization. This includes evaluating on an individual client basis the type of supportive services offered, and length of time households may participate in the PSH program. The CoC recommends that programs should not limit the amount of time households may receive PSH assistance to ensure long-term housing stability.
- Participants in PSH rental assistance programs are expected to pay the higher of 30% of their income(monthly, adjusted), 10% of their gross monthly income, or the or the portion of the family's welfare assistance that is designated for housing assistance toward rent (including utilities). If the participant has zero income, the participants are not required to pay rent, but their supportive services partner is expected to work with them to secure income (either earned or unearned) as soon as possible. In no circumstance can a tenant be charged an amount above the rent calculation standard established by HUD.
- Occupancy charges are not required to be imposed on program participants in projects funded with leasing. If a program opts to charge participants in leasing programs an occupancy, it may not exceed the higher of 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance designated for housing assistance. Refer to HUD CoC Rent Calculation-Charging Rent for more information.
- Individual Case Management and Supportive Services should be offered at least monthly. Housing Stability Case Management assists participants in locating and obtaining suitable permanent housing, which may include:
  - Assessment of housing barriers, needs, and preferences
  - Development of an action plan for locating housing
  - Housing search
  - Outreach to and negotiation with owners



- Tenant support and/or counseling
- Assessment of housing for compliance with CoC requirements for housing quality standards, lead- based paint, and rent reasonableness
- Assistance with submitting rental applications
- Understanding leases
- Arranging for utilities
- Making moving arrangements
- Documented contacts with PSH participants.

- Ongoing Case Management and other Supportive Services include assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who has obtained permanent housing through the PSH program by:
  - Developing an individualized housing and service plan, including planning a path to permanent housing stability
  - Developing, securing, and coordinating services
  - Obtaining Federal, State, and local benefits
  - Monitoring and evaluating program participant progress
  - Providing information about, and referrals to, other providers
  - Conducting annual re-evaluations and annual HQS re-inspections
- Other eligible services may be provided including:
  - Legal Services to resolve a legal problem that prohibits a program participant from obtaining or retaining permanent housing, including:
    - Client intake
    - Preparation of cases for trial
    - Provision of legal advice
    - Representation at hearings
    - Counseling
    - Filing fees and other necessary court costs
  - Mediation between the program participant and the owner or person(s) with whom the participant is living;
  - Credit Repair, including:
    - Credit counseling
    - Accessing a free personal credit report
    - Resolving personal credit problems
    - Other services needed to assist with critical skills related to household budgeting and money management
  - Food for meal preparation or life-skills coaching
  - Additional eligible costs may be found at 24 CFR 578.53

Service Coordination

- The program may assist program participants, pursuant to 24 CFR 578.53, in attempting to obtain appropriate supportive services and other Federal, State, local, and private assistance available for such individuals as needed

and requested by the household. Staff should be knowledgeable about mainstream programs and services in the community.

- Arrangements shall be made as appropriate and available with community agencies and individuals for the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; chemical dependency assessments and treatment; legal services; budgeting and credit repair; and other assistance requested by the participant, which are not provided directly by the program.

- Other homeless and mainstream resources for which, if eligible, a client may be assisted in obtaining, include: Emergency Financial Assistance; domestic violence shelters; local Housing Authorities, public housing, rent subsidies and subsidized housing; temporary labor agencies; childcare resources and public programs that subsidize childcare; consumer credit counseling service agencies; youth development and child welfare; Community Support Programs; WIC; SNAP; Unemployment Insurance; Social Security benefits; Medicaid/Medicare.

Follow-up Services

- The program shall attempt to provide a continuity of services as necessary to all participants following their exit from the program. These services can be provided directly and/or through referrals to other agencies or individuals.
  - The program develops exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
  - It is recommended that a program attempt to follow up with phone or written contact at least once per month for six months after the client exits the program, having received their final month of rental assistance. A program may provide follow-up services that include identification of additional needsand referral to other agency or community resources in order to prevent future episodes of homelessness.

Termination

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

- In terminating assistance to a program participant, the agency must follow the due process provisions set forth in 24 CFR 578.91, as well as the following process:



1. providing the program participant with a written copy of the program rules and the termination & grievance policies at client intake, before the participant begins to receive assistance;
2. written notice to the program participant containing a clear statement of the reason for termination;
3. providing a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and providing
4. prompt written notice of the final decision to the program participant.

- Termination under this section does not bar the program from providing further assistance at a later date to the same individual or family.
- Programs are encouraged to re-house, rather than terminate assistance to households that are evicted from their housing while participating in the PSH program.
- Programs are encouraged to attempt to transfer clients to another PSH program within the CoC if termination cannot be avoided. Refer to the MO BoS CoC Coordinated Entry Written Standards for information on Project to Project Transfers.



Joint Transitional-TH-RRH Programs

Eligibility and Prioritization

All Program participants must meet the eligibility requirements (see Homeless Eligibility), and be referred from Coordinated Entry.

- The program will prioritize each applicant household using the CoC Coordinated Entry process, and any internal program priorities as set forth in the original or amended CoC program application.

Program Standards

Client Intake

- The program will be an active member in the Coordinated Entry system. The program will have minimal entry requirements to ensure the most vulnerable of the population are being served. The program will assist participants in locating safe, affordable housing that meets participants' needs in accordance with client intake practices and within CoC guidelines for TH-RRH Programs.
- Programs cannot disqualify an individual or family because of evictions or poor rental history, criminal history, credit history, lack of financial resources, or a history of domestic violence.
- The program explains the services that are available and the expectations for participation. A copy of the program expectations and termination and grievance policies are given to the household prior to program entry.
- Participants must be offered both components of the TH-RRH project, choosing which is the most appropriate for them; participants may choose to participate in one or both components, depending on household need
- Projects must be able to provide both components to all program participants for up to 24 months as needed by the program participants; however, there is no requirement that program participants utilize both TH and RRH during their project enrollment. Additionally, there is no minimum length of stay in any portion of the project. The total length of assistance that a program participant can receive in the entire project is 24 months. The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants will be offered copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.

Program Operations

- The program will assist participants in locating and stabilizing in safe, affordable housing that meets participants' needs. In assisting in locating housing, the program considers the needs of the individual or family experiencing homelessness. Program participants may choose housing outside of the CoC's geographic area if the program agency staff have the capacity to meet rent and service assistance requirements outlined in the CoC Interim Rule. 24 CFR 578.51(c)(4)



- Programs will assess potential housing for compliance with HUD Housing Quality Standards, lead- based paint, rent reasonableness standards, and Fair Market Rent (FMR)(as applicable) (based on comparable units in the same zip code) prior to the participant signing a lease with the landlord.
- The program provides assistance in accessing suitable housing through landlord engagement and housing search services. The program may provide assistance in accordance with 24 CFR 578.51, 578.53, and 578.55.
    - Eligible Rental Assistance costs for the RRH component under 24 CFR 578.51 may include security deposits (up to 2 months), short and/or medium term tenant based rental assistance, last month's rent (when paid with a deposit and 1 st month's rent), up to one month in vacancy payments, and up to one month's rent in damages.
    - Eligible Supportive Services assistance costs for both TH & RRH components under 24 CFR 578.53 may include utility deposits, rental application fees, childcare, food, education services, case management, public transportation, housing & relocation services, credit repair, and legal services related to obtaining or retaining permanent housing. Eligible Operating costs for the Transitional Housing component under 24 CFR 578.55 may include the day-to-day costs of the TH structure or housing units, including maintenance, taxes and insurance, building security, gas, electric, water, furniture, and equipment. Leasing costs are eligible for the Transitional Housing component if the TH units are not owned by the agency.
- Ineligible costs under CoC TH-RRH include:
    - Utility Payments for utilities not included in Tenant Based Rental Assistance
    - Utility and/or Rental Arrears
    - Operating Costs combined with Rental Assistance; the TH component may also utilize Operating Costs if part of the approved project budget
- The RRH program participant must sign a legally binding written lease for a term of at least one year that is renewable (for a minimum term of one month), and terminable only for cause, with the landlord which must include a lease provision or addendum that includes all requirements that apply to tenants, the owner, or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking). TH component households must have occupancy agreements or sub-leases with the agency for a term of at least one month and be automatically renewable upon expiration (for a maximum term of 24 months).
- The program staff and the participant should work together to develop a housing stabilization plan, which may include financial goals, periods and amounts of assistance, meeting schedules, employment goals, and a program exit strategy.



- Assistance will be tailored to individual client needs in order to reach housing stabilization. This includes evaluating on an individual client basis the length of time rent and supportive services will be provided. The CoC recommends that programs should not limit the amount of time households may receive assistance outside of the 24 month standard set by HUD, to ensure long-term housing stability.
- The CoC does not require TH-RRH programs to require that program participants share in the cost of their RRH rental assistance or make income contributions/occupancy charges for TH. If the agency requires rent cost sharing/occupancy charges, the agency must have standards for client income contribution to rent. If an agency has income contribution standards they must apply to all program participants equally; for the purposes of calculating rent contributions, the rent shall equal the total monthly unit rent and, if the tenant pays separately for utilities, the monthly utility allowance set by the local PHA. HUD regulations do not require clients to contribute any portion of income to rent when providing TH-RRH assistance. 24 CFR 578.37
- For RRH, individual case management is required at least monthly. 24 CFR 578.37(F). For TH, programs must offer case management to program participants at least monthly. Housing Stability Case Management assists participants in locating and obtaining suitable permanent housing, which may include:
    - Assessment of housing barriers, needs, and preferences
    - Development of an action plan for locating housing
    - Housing search
    - Outreach to and negotiation with owners
    - Tenant support and/or counseling
    - Assessment of housing for compliance with CoC requirements for housing quality standards, lead- based paint, and rent reasonableness
    - Assistance with submitting rental applications
    - Understanding leases
    - Arranging for utilities
    - Making moving arrangements
    - Monthly documented contacts with TH-RRH participants.
- Ongoing Case Management services include assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who has obtained permanent housing through the TH-RRH program by:
    - Developing an individualized housing and service plan, including planning a path to permanent housing stability
    - Developing, securing, and coordinating services
    - Obtaining Federal, State, and local benefits
    - Monitoring and evaluating program participant progress
    - Providing information about, and referrals to, other providers

    - Conducting annual re-evaluations to determine on-going program eligibility and document lack of sufficient resources to retain housing with CoC assistance (24 CFR 578.38(E)
- Other eligible services may be provided including:
    - Legal Services to resolve a legal problem that prohibits a program participant from obtaining or retaining permanent housing, including:
        - Client intake
        - Preparation of cases for trial
        - Provision of legal advice
        - Representation at hearings
        - Counseling
        - Filing fees and other necessary court costs
    - Mediation between the program participant and the owner or person(s) with whom the participant is living;
    - Credit Repair, including:
        - Credit counseling
        - Accessing a free personal credit report
        - Resolving personal credit problems
    - Other services needed to assist with critical skills related to household budgeting and money management
- The program must re-evaluate the household for continued eligibility a minimum of every 12 months. To continue to receive TH-RRH assistance, the household must demonstrate:
    - Lack of resources and support networks. The household must continue to lack sufficient resources and support networks to retain housing without program assistance.
    - Need. The program must determine the amount and type of assistance that the household needs/wants to (re)gain stability in permanent housing.
- Supportive services may be provided for no more than 6 months after rental assistance stops. 24 CFR 578.37(D)

Service Coordination

- The program may assist program participants, pursuant to 24 CFR 578.53, in attempting to obtain appropriate supportive services and other Federal, State, local, and private assistance available for such individuals as needed and requested by the household. Staff should be knowledgeable about mainstream programs and services in the community.
    - Arrangements shall be made as appropriate and available with community agencies and individuals for the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; chemical dependency assessments and treatment; legal services; budgeting and

credit repair; and other assistance requested by the participant, which are not provided directly by the program.
    - Other homeless and mainstream resources for which, if eligible, a client may be assisted in obtaining, include: Emergency Financial Assistance; domestic violence shelters; local Housing Authorities, public housing, rent subsidies and subsidized housing; temporary labor agencies; childcare resources and public programs that subsidize childcare; consumer credit counseling service agencies; youth development and child welfare; Community Support Programs; WIC; SNAP; Unemployment Insurance; Social Security benefits; Medicaid/Medicare.

Follow-up Services

- The program shall attempt to provide a continuity of services as necessary to all participants following their exit from the program. These services can be provided directly and/or through referrals to other agencies or individuals.
    - The program develops exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
    - It is recommended that a program attempt to follow up with phone or written contact at least once per month for six months after the client exits the program, having received their final month of rental assistance. A program may provide follow-up services that include identification of additional needs and referral to other agency or community resources in order to prevent future episodes of homelessness.
    - Participants may receive a maximum of 6 months of supportive services after the final rental assistance is provided to the household.

Termination

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

- In terminating assistance to a program participant, the agency must follow the due process provisions set forth in 24 CFR 578.91, as well as the following process:
    1. providing the program participant with a written copy of the program rules and the termination & grievance policies at client intake, before the participant begins to receive assistance;
    2. written notice to the program participant containing a clear statement of the reason for termination;
    3. providing a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a

person other than the person (or a subordinate of that person) who made or approved the termination decision; and providing prompt written notice of the final decision to the program participant.

- Termination under this section does not bar the program from providing further assistance at a later date to the same individual or family.
- Programs are encouraged to re-house, rather than terminate assistance to households that are evicted from their housing while participating in the TH-RRH program.
- Programs are encouraged to attempt to transfer clients to another TH-RRH program within the CoC if termination cannot be avoided. Refer to the MO BoS CoC Coordinated Entry Written Standards for information on Project to Project Transfers.