Continuum of Care (CoC) Program Refresher

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Agenda

- Welcome and Introductions
- CoC Program Components
- Eligibility and Documentation
- Rental Assistance vs. Leasing
- Eligible Costs and Match
- General Program Workflow
- Other Requirements under CoC
- Resources
- Questions

Welcome and Introductions

Introduce yourself in the chat:

✓ Name and Pronouns

✓ Agency

✓ Role/Title

What do we hope to get out of today?

Objectives

✓ Attendees will have an understanding of HUD CoC Program requirements, including program components, eligibility, eligible costs, etc.

✓ Attendees will have an understanding of Lane County CoC and local standards for CoC funded projects.

✓ Attendees will understand where to find applicable regulations and information about the CoC funding source

History and Context

1987: Congress passes first federal law specifically addressing homelessness – later renamed to be McKinney Vento Homeless Assistance Act

1987-1993: HUD held national competitions each year for its homeless assistance funds; individual organizations wrote applications

1994-2009: CoC concept was first introduced by HUD – required each community to come together to submit a single, collaborative application

2009-present: HEARTH Act amends and reauthorizes McKinney-Vento – consolidated HUD's competitive grant programs into one CoC Program, along with other substantial changes

What is the Continuum of Care?

- Community-wide planning and coordination of programs, ensuring issue of homelessness is addressed in a coordinated, comprehensive, and strategic manner

- Promotes community-wide commitment to the goal of ending homelessness

- Provides funding for local agencies (nonprofit and government) to house people experiencing homelessness

- Promotes access to and effective utilization of mainstream programs

Lane County CoC

- OR-500 Eugene, Springfield/Lane County CoC

- Governed by Poverty and Homelessness Board (PHB), the **CoC Board**

- Managed by the **Collaborative Applicant** (Lane County)

Lane County CoC

In managing the CoC, Lane County is responsible for:

- Establishing and operating the **Coordinated Entry System** (Central Waitlist, or CWL)

- Designating and operating the **Homeless Management Information System** (HMIS)

- System Operations and Planning
    - Develops local **strategic plan to end homelessness**
    - Establishes **performance targets, monitors performance, and evaluates outcomes**
    - Development of **written standards** and technical assistance

- Completing **annual application** for HUD CoC funding

HUD Funding Process

- Notice of Funding Opportunity (NOFO)
  - Collaborative Applicant (Lane County)
  - Co-Applicants SVdP and Homes for Good

- CoC Consolidated Application
  - CoC Application (System Planning)
  - Project Applications and Priority Listing (Funding Recipients and Subrecipients)

HUD Funding Process

NOFO Released by HUD

Spring/Summer

Co-applicants complete project applications for all HUD-funded renewal projects.
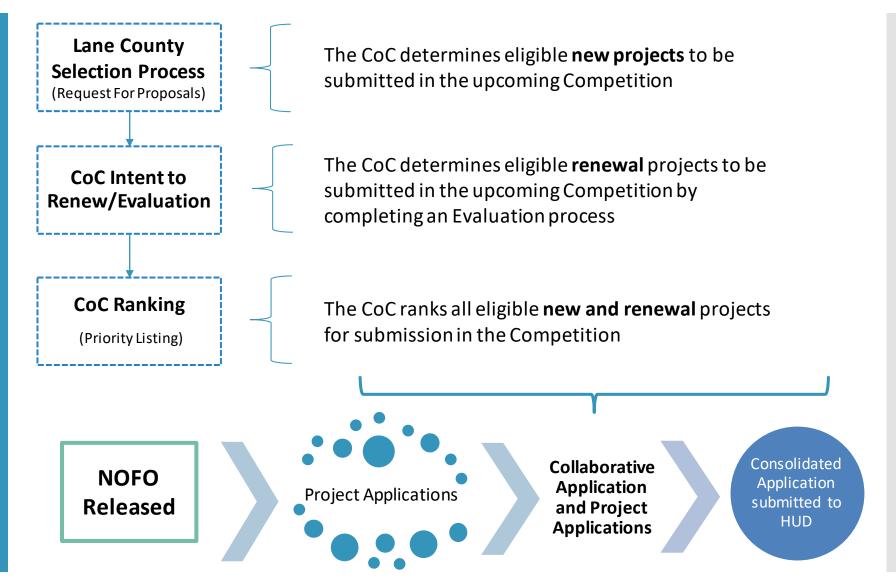
Collaborative Applicant collects and reviews all applications and completes the CoC Application

Project Applications and CoC Application are submitted as one Consolidated Application to HUD

Winter

Awards Issued by HUD

Local Process

Lane County Selection Process
(Request For Proposals)

The CoC determines eligible **new projects** to be submitted in the upcoming Competition

CoC Intent to Renew/Evaluation

The CoC determines eligible **renewal** projects to be submitted in the upcoming Competition by completing an Evaluation process

CoC Ranking
(Priority Listing)

The CoC ranks all eligible **new and renewal** projects for submission in the Competition

NOFO Released → Project Applications → **Collaborative Application and Project Applications** → Consolidated Application submitted to HUD

Current CoC Funded Projects

Current CoC Award is $6.6 million, which includes $1.7 in YHDP, $280K in Planning, and about $500K in new Projects

Applicant	Subrecipient	Project	Project Type	Amount FY23
SVdP	n/a	VetLIFT	PSH	$241,005
SVdP	n/a	LIFT	PSH	$311,537
SVdP	n/a	Connections	RRH	$243,084
Homes for Good	Laurel Hill Center, ShelterCare	Madrone/SPC	PSH	$829,786
Lane County	Mainstream Housing Inc.	Emerald Options	PSH	$219,485
Lane County	ShelterCare	Camas	PSH	$207,810
Lane County	ShelterCare	Sahalie	PSH	$224,880
Lane County	ShelterCare, Looking Glass, CCS	McKenzie	RRH	$729,618
Lane County	ShelterCare; Homes for Good	Shankle/MLK	PSH	$541,979
Lane County	Laurel Hill Center	The Nel	PSH	$232,381
Lane County	n/a	HMIS	HMIS	$135,995
				$3,917,560

CoC Program Components

CoC funding primarily supports **Permanent Housing** programs:
- ✓ Permanent Supportive Housing (PSH)
- ✓ Rapid Re-housing (RRH)

CoC funding also supports **System Capacity**:
- CoC Planning
- Homeless Management Information System (HMIS)
- Coordinated Entry (SSO-CE)

Other Program Types (YHDP funded):
- Joint Transitional Housing and Rapid Re-housing (Joint TH-RRH)
- Supportive Services Only (SSO)

Permanent Housing

Permanent Housing under the CoC Program:

- PSH and RRH

- Community-based housing without a designated length of stay

- Program participant must be tenant on lease or sublease for a term of at least one year and must be renewable

Permanent Supportive Housing

- In PSH, **both** the <u>housing assistance</u> and <u>the services</u> are meant to be **permanent**

- Long-term housing and supportive services to assist persons experiencing homelessness who **have a disability** (at least one adult or child)

- Can be project-based or scattered site

- Emphasis on serving those who are **chronically homeless, prioritizing individuals with the highest needs and vulnerabilities.**

- **New PSH** funded through the CoC typically must only serve individuals who are chronically homeless

- **Ongoing supportive services** must be available throughout enrollment in the program

Rapid Re-housing

- In RRH, the <u>housing</u> is meant to be **permanent**, but <u>the services and assistance</u> are **temporary**

- Short-term (1-3 months) or medium-term (4-24 months) of housing and supportive services to assist persons experiencing homelessness in obtaining and maintaining stability in housing

- Tenant-based assistance

- May or may not include individuals with a disability

- Prioritized locally for individuals who are chronically homeless, but may or may not serve those who have the highest needs and vulnerabilities

- At least **monthly case management** must be provided

RRH Standards

Rapid Re-Housing under the CoC Program must follow locally established CoC Standards

Standards outline:

- Core Components - Housing Identification, Case Management, and Rental Assistance

- Limits on Amount and Type of Assistance

- Calculating Tenant Contribution to Rent

- Termination Guidelines

Households enrolled in RRH must complete re-evaluation every three months for continued eligibility and assistance

Eligibility

Who is eligible to be served in my program?

Eligible Program Participants determined by:

- ✓ Housing Status (always)
- ✓ Disability Status (PSH always)
- ✓ Chronic Homeless Status (PSH if applicable)

Definitions and Documentation

- Order of Preference

Housing Status

All CoC program participants must meet housing status requirements to be eligible for enrollment

Categories of Homelessness

- ✓ Category 1: Literally Homeless
- ✗ ~~Category 2: Imminent Risk~~
- ✗ ~~Category 3: Homeless Under Other Federal Statutes~~
- ✓ Category 4: Fleeing/Attempting to Flee DV

In general, individuals meeting definitions of Categories 1 or 4 may be served in CoC programs.

CoCs are only permitted to serve individuals meeting Categories 2 or 3 with HUD approval or High Performing Community designation

Category 1

Literal Homelessness

- An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - Has a primary nighttime residence that is a **place not meant for human habitation** or ordinarily used as a regular sleeping accommodation; **OR**
  - Living in a publicly or privately operated **shelter** designated to provide temporary living arrangements (including congregate shelters, transitional housing, and **hotels/motels paid for by charitable organizations** or by fed/state/local government; **OR**
  - **Exiting an institution where they resided for 90 days or less** and were residing in one of the above immediately before entering institution

Category 4

Fleeing or Attempting to Flee DV

- Any individual or family who:
    - Is fleeing, or is attempting to flee, domestic violence;
    - Has no other residence; **and**
    - Lacks the resources or support networks to obtain other permanent housing

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

Defining Family

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.

Documenting Homelessness

Must have **written policies and procedures** that:

- ✓ require staff to document eligibility <u>at intake</u>
- ✓ specify the evidence to rely upon and the order of preference
- ✓ include standards for documenting due diligence

Order of Preference:

1. Third Party documentation
2. Intake worker observation
3. Certification from the person seeking assistance (self-report)

Documenting Homelessness

Appropriate Documentation:

Criteria and Recordkeeping Requirements for Definition of Homeless

Most **common** types of documentation

- **Category 1**: letter from service provider (emergency shelter, outreach worker, or other); HMIS Records of shelter stay/outreach engagement

- **Category 4**: Oral statement certifying status – see details! If not a Victim Service Provider, must have additional documentation

Don't forget to document due diligence – if unable to obtain third party documentation, **MUST** document attempts to do so!

Self Report = Last Resort!

Disability Status

- Required only when a disability is a requirement for entry into the program (i.e. PSH programs that require CH status or disability for Entry)

- Must document the disability status of all program participants at intake

- Disability is defined as:
  - **Physical, mental or emotional impairment**, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, brain injury or a chronic physical illness that:
    - Is expected to be long-continuing or of indefinite duration; **and**
    - Substantially impedes the person's ability to live independently; **and**
    - Could be improved by more suitable housing.
  - Developmental Disability as defined in Section 102 of the Developmental Disability Assistance and Bill of Rights Act of 2000
  - Disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome

Documenting Disability

PSH participants <u>must</u> have a documented disability in order to be eligible

- ✓ Written verification of a disability from professional licensed by the state to diagnose and treat the disability;

- ✓ Written verification from the Social Security Administration;

- ✓ The receipt of a disability check (e.g. SSDI check or Veteran Disability Compensation);

- ✓ Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by evidence above

Typically, a standard form letter can be provided to the professional for signature which has the qualifications outlined.

Chronic Homeless Status

A person meeting the definition of literally homeless (category 1)

AND

Has been homeless continuously for at least 12 months

OR

On at least 4 separate occasions in the last 3 years where the combined occasions equal a total of 12 months

- ✓ Occasions must be separated by a break of at least seven nights
- ✓ Stays in institutions of fewer than 90 days do not constitute a break

Chronic Homeless Status

A **family** with an adult head of household (or minor if no adults in family) who meets all of the criteria, including a family whose composition has fluctuated while the head of household has been homeless

Chronic Homelessness Documentation

Required to have **written intake procedures**

Must have **all** of the following to document CH status:

✓ Evidence of homeless status

AND

✓ Evidence of disability

AND

✓ Evidence of duration of homelessness

Chronic Homelessness Documentation

Continuous (12 months):

At least 9 months of the 12 months must be documented by one of the following:

- HMIS data; written referral; written observation of outreach worker
- Single encounter within 1 month is sufficient to count the entire month unless there is evidence of a break during that month (e.g. stay in TH documented in HMIS)

Episodes (if using episodic criteria):

At least 3 occasions must be documented using the following:

- HMIS data; written referral; written observation of outreach worker

Dedicated PLUS

Overview-of-Dedicated PLUS-Eligibility-and-Recordkeeping-Requirements

A DedicatedPLUS project is a permanent supportive housing (PH-PSH) project where the entire project will serve individuals and families where the head of household has a disability and who meet any of the following criteria at project entry (in any order):

1. Experiencing chronic homelessness as defined in 24 CFR 578.31;

2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;

3. Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;

4. Residing in transitional housing funded by a Joint transitional housing (TH) and rapid re-housing (PHRRH) component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;

5. Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or

6. Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

Document Check!

Do you have proof of eligibility in your client files?

- Homelessness documentation

- Disability documentation (PSH)

- Chronic homelessness documentation (if applicable)

Are forms signed and dated? It's important to ensure all eligibility documentation includes dates that tie to the Entry/Intake!

QUIZ TIME

TRUE OR FALSE:

Those with higher incomes are not eligible for CoC Rapid re-housing.

False.

In order to be eligible for CoC RRH assistance, a household must meet the definition of homeless under Category 1 (literally homeless) or Category 4 (fleeing DV).

The CoC Program Interim Rule does <u>not</u> establish an income eligibility guideline for continued RRH assistance. A CoC may establish an income requirement to align with ESG or other written standards.

At re-evaluation, CoC RRH participants must lack resources and support networks to help them remain housed and must have a demonstrated need for continued assistance. If income is high, a household may be recommended for minimal assistance.

QUIZ TIME

Are there any circumstances when a program participant's disability diagnosis can be documented via self-report?

No - The condition must be documented with third-party documentation.

For eligibility in PSH, a program participant's disability must also be of long and continuing duration, substantially impede the program participant's ability to live independently, and be improved by the provision of more suitable housing conditions.

QUIZ TIME

Can a child with a disability qualify a household as chronically homeless?

No - Only if the child is a minor head of household.

Under the definition of chronically homeless, the head of household (either an adult or a minor if there is no adult present) must have the qualifying disability and meet all of the other criteria (i.e., length of time homeless) in order for a family to be considered chronically homeless.

Where there is no adult member of the family, then a minor can be identified as the head of household and that individual is who must meet the criteria.

Note: when there are multiple adults in the presenting family, or multiple minors in a family with no adult, HUD does not specify which adult or minor must be the head of household and relies upon the family to self-determine which adult is the head of household.

Housing Search

Individuals should be **actively engaged** in the housing search process and assisted in locating housing that meets their individual needs to the greatest extent possible

It should be evident in documentation and case notes that the household was actively assisted in the housing search process.

Agencies should:

- Assess a household's needs/wants related to housing

- Assist in the housing search (do NOT simply send lists of vacancies)

- Call property management companies or landlords *with* your participant

- Go to showings or walk-throughs and discuss what to ask, what things to look for, etc.

- Walk through the lease up process with the participant

- Be there at move-in time and lease signing

Housing Inspections

Both leasing and rental assistance units must meet **Housing Quality Standards (HQS)**

- Each unit must be physically inspected

- Owner has 30 days to correct any deficiencies

- Inspect units at least annually

- HQS inspectors do not need to be certified, but this is recommended

- Must also meet state/local codes; occupancy standards

- Must also document Lead Based paint visual assessment (constructed before 1978, children under 6 or pregnant woman)

NOTE: HUD CoC Inspections are moving to NSPIRE Standards in 2024.

Leases

Must have signed lease agreement in place before disbursing any funds:

- ✓ All initial leases in CoC PSH or RRH <u>must be one year</u>

- ✓ Automatically renewable – CoC PSH

- ✓ Renewable and terminable only for cause – CoC RRH

- ✓ Must be between *tenant and owner* – Rental Assistance

- ✓ Must be between *Agency and owner* with sublease - Leasing

Summary of Lease/Occupancy Agreement Requirements			
Component	CoC Funding	Lease/Sublease	Occupancy Agreement
PH:PSH	Rental Assistance	Required	Not Allowed
	Leasing	Required	Not Allowed
PH:RRH	Rental Assistance	Required	Not Allowed

Leasing

- Eligible model under PSH

- Funds to pay rent on <u>structures or individual units</u> to provide supportive housing or supportive services

- Leasing is tied to *property*

- Agency leases units to then sublease to participants

- Units remain with the program even if the tenant leaves or exits until the agency-held lease ends

- May <u>not</u> use CoC leasing funds to lease units or structures owned by the recipient, sub-recipient, or any related organization

Rental Assistance

- Eligible model under PSH or RRH

- All RRH is Rental Assistance

- CoC Rental Assistance funds pay part of the rent for a unit in which a program participant will reside

- Rental Assistance is tied to *persons*

- Participant enters into a direct lease with the landowner and is responsible for that lease when the program ends

- Program must locate units for each participant as units do not remain with the program

- Typically is medium (4-24 months) term assistance

- May be tenant-based, project-based, or sponsor-based
  - RRH is tenant-based only

Leasing vs. Rental Assistance

Leasing	Rental Assistance
Recipient or subrecipient (Agency) must be the tenant of the landowner	Program participant is the **sole party on the lease** with the landowner
Program participant must be **sublessee** (PSH)	Recipient or subrecipient must have written *agreement* with landowner
Recipient or subrecipient (agency) must pay rent directly to the landowner	Program participant pays rent directly to landowner
Recipient or subrecipient (Agency) is responsible for 100% of the rent	Recipient or subrecipient (Agency) makes rental payments to landowner based on the difference between total rent and amount paid by participant
Rent can be paid on a vacant unit	Recipient or subrecipient (Agency) not responsible for portion of rent paid by the participant
Leasing funds do not have a matching requirement	Cannot make payments on a vacant unit, with exceptions
	Rental Assistance funds have a match requirement

FMR and Rent Reasonable

Fair Market Rent (FMR) applies to *both* leasing and rental assistance

Rent Reasonable

Ensures HUD program participants do not pay more than non-program participants for rent

Must be reviewed annually

Must document appropriately –conduct comparison of similar units (at least 3) using Rent Reasonableness Determination Form

RA vs. Leasing FMR and RR Requirements

Rental Assistance	Leasing
CoC RA costs *can* exceed FMR	CoC Leasing costs **cannot** exceed FMR
Must meet rent reasonable guidelines	Must meet rent reasonable guidelines
May use CoC funds for costs exceeding FMR as long as rent reasonable	May pay above FMR if using non-CoC leasing funds • Program income or match • Other non-CoC funds
Security Deposit – up to 2 months rent	Security Deposit – up to 2 months rent
Property damage – up to 1 month rent • NOT RRH	Property Damage not eligible

Document Check!

Do you have **housing documents** in your client files?

- Housing Search (e.g. questionnaire, app fees paid, etc.)

- HQS Inspection prior to move in

- Lease

- Rent Reasonable Determination and FMR

Tenant Rent Contribution: PSH RA

PSH Programs with Rental Assistance:

Rent must be charged and be equal to the *highest* of:

- 30% of family's monthly adjusted income;
- 10% of the family's monthly gross income; or
- The portion of the family's welfare assistance, if any, that is designated for the payment of rent.
- No payment required for those with no income

This regulation does not apply to programs with Leasing funds.

This regulation does not apply to programs under RRH component.

Tenant Rent Contribution: PSH Leasing

PSH Programs with Leasing:

Rent *may* be charged, and if charged, may not exceed the highest of:

- 30% of family's monthly adjusted income;
- 10% of the family's monthly gross income; or
- The portion of the family's welfare assistance, if any, that is designated for the payment of rent.
- No payment required for those with no income

For all CoC PSH projects, income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).

The provider must examine a participant's income initially at Entry, and at least annually thereafter.

If there is a change in family composition (e.g., birth of a child) or a decrease in the household income during the year, the participant may request an interim reexamination, and the occupancy charge or rent will be adjusted accordingly.

Tenant Rent Contribution: RRH

The initial amount of rental assistance and level of participant contribution is determined for each household based on income and budget, client need, and other factors using a progressive engagement approach

Adjustments should be made as circumstances change or no less than every three months at re-certification

General Guidelines

- The program may pay up to 100% of rent only for the first three months of subsidy, for households with income.

- On average, participants will pay between 30-50% of their gross monthly income toward rent.

- Participant rent contribution should not exceed 50% gross monthly income while enrolled in RRH.

- Subsidy should follow a graduated model, reducing subsidy over time, and be individualized to the household.

- Households with zero income will have no contribution to rent until income is gained.

CoC Rent Calculation Steps

1. Determine annual income (all adult hh members)

2. Determine deductions (dependents, childcare, disability assistance, medical expense, elderly/disabled)

3. Determine annual *adjusted* income based on deductions

4. Determine Rent amount and tenant contribution (previous slides)

5. Determine utility allowance

Use a Calculation worksheet to properly calculate tenant rent and utilities! This should be in the file to demonstrate how tenant rent was calculated.

Utilities

Utilities include gas, electric, water, sewer, trash only!

- If utilities are not included in the rent but are the responsibility of the resident, a utility allowance must be subtracted from the rent calculation.

- If the cost of utilities is less than the permitted monthly rental amount, the amount of rent must be reduced by the cost of utilities.

- If the cost of utilities is greater than the permitted monthly rental amount, the household should receive a reimbursement

Notice CPD-17-11: Determining a Program Participant's Rent Contribution, Occupancy Charge or Utility Reimbursement in the Continuum of Care (CoC) Program when the Program Participant is Responsible for the Utilities

Agencies are encouraged to review this notice in full to understand how utilities must be calculated in the CoC Program.

Document Check!

Do you have **rent documents** in your client files?

- Income documentation

- Tenant rent calculation (initial, recert., annual)

- Documentation of rent payments made

Services

Service Requirements:

- Both PSH and RRH are required to make supportive services available throughout the duration of the enrollment

- Each recipient and subrecipient must conduct an *ongoing assessment of the supportive services needed*, the availability of such services, and the coordination of services needed to ensure long-term housing stability

Services

- All housing programs should have **a housing stability plan** with the tenant that outlines *specific and measurable* goals for obtaining and maintaining housing. Goals should be related to what will get them housed and keep them housed.

- RRH programs must also have a **rental assistance plan** that outlines the amount of rent assistance paid and the plans for when assistance ends

Referrals and Mainstream Benefits

Required to document referrals made to other community based supports or services not provided by the agency

Must coordinate with and connect participants to mainstream benefits for which they may be eligible including:

- TANF
- SNAP
- Social Security (SSI/SSDI)
- Medicare/Medicaid/Health Insurance
- Veteran's Benefits
- Job Training/Employment Programs
- Substance Use
- Mental Health

Document Check!

Do you have **service documents** in your client files?

- Service assessment (at least annual)

- Housing Stability Plan or Rent Assistance Plans

- Case notes showing at least monthly case management

- Referrals made

- Connection to mainstream benefits

CoC Workflow

1. Request/Receive referral from Coordinated Entry (required)
2. Contact referred household and assess for eligibility (intake)
3. If eligible under CoC, enter into the program (HMIS)
4. Assess service needs and other factors that impact housing (e.g. income)
5. Begin housing search or connect to available unit (housing search)
6. Inspection, Rent Calculation, FMR/Rent Reasonableness, Lease, Move In Date
7. Ongoing service plans, housing plans, case management, rent payments
8. If RRH, ongoing recertification and reassessment every 3 months
9. Annual inspection, re-assessments of services and needs
10. Exit and transition planning when appropriate, follow ups

QUIZ TIME

Which items are required to be completed or updated at least annually?

a. Service Assessments/Plans

b. Rent Reasonableness

c. Inspection

d. Rent Calculation

e. All of the above

e. ALL OF THE ABOVE

All of these items need to be revised at least annually. Some, like service plans or rent calculations, may need to be revised more frequently depending on the household or program.

Eligible Costs

- Acquisition/Rehabilitation/New Construction

- Leasing

- Rental Assistance

- Supportive Services

- Operating

- HMIS

- Project Admin

Eligible Costs

Not all eligible costs are eligible under each program component:

Eligible Costs	Permanent Housing		TH	SSO	HMIS
	PH: PSH	PH: RRH			
Acquisition	✓				
Rehabilitation	✓				
New construction	✓				
Leasing	✓				
Rental assistance	✓	✓			
Supportive services	✓	✓			
Operating costs	✓				
HMIS	✓	✓			✓
Project Administration	✓	✓			✓

Program Components (header over columns PH: PSH, PH: RRH, TH, SSO, HMIS)

Eligible vs. Approved Costs

Eligible costs are those included in the CoC Interim Rule

Approved costs are the budget line items specifically approved by HUD in the recipient's grant agreement

In the project application submitted to HUD, the agency requests CoC Program funds to pay for specific costs

Example: If a project does not have operating budget line items in their approved budget, they cannot spend on operating costs even if they are eligible costs for the program

Approved costs can be adjusted through amendment or budget changes with Lane County and the local HUD field office

Match

- CoC programs are required to provide *at least* **25% match** of all line items other than Leasing

- Match is **cash or in-kind** resources from other sources that is spent on **eligible** program costs and activities

- Cash match requires a commitment in writing prior to grant agreement

- In-kind match requires additional documentation (MOU)

- Since FY15, HUD has allowed recipients to use program income as match

- HSC funding provided in Lane County CoC contracts can be used toward the match requirement when spent on eligible costs

Leasing

- Eligible under **PSH only**

- Funds can be used to pay rent on **structures or individual units** to provide supportive housing or supportive services

- May <u>not</u> use CoC leasing funds to lease units or structures owned by the recipient, sub-recipient, or any related organization

- May be used for **rent, security deposits, first/last month rent, as well as staff or related costs to carry out leasing activities**

- Does not require match!

- Typically used in conjunction with *Operating* to maintain units for program use

- Can pay on a vacant unit

Rental Assistance

- Eligible under PSH or RRH

- CoC Rental Assistance funds pay part of the rent for a unit in which a program participant will reside

- Rent can be paid for up to 24 months in RRH, no limit for PSH Rental Assistance

- May be tenant-based, project-based, or sponsor-based
  - **RRH is tenant-based only**

- Does require match

Rental Assistance

In addition to rent, recipients and subrecipients may use rental assistance funds to pay for:

- Property damages (one month, only under PSH RA)

- Limited vacancies (30 to 90 days depending upon the circumstances)

- Security deposits and first and last month's rent

- Rents above FMR that are within rent reasonableness

- Adding participants and units in excess of the original proposal

Each agency must set up a system to track and manage its rental assistance budget line item to ensure enough funds exist to cover the number of units the agency committed to serving for the grant period.

Operating

- Eligible under PSH, with Leasing only

- Costs associated with day-to-day *physical operation* of housing in which participants are housed

- Maintenance and repair, major building systems, building security, utilities, furniture, equipment, etc.

- May **NOT** fund general staffing (case manager FTE), but can fund overhead costs related to above activities (e.g. security personnel)

- Equipment and furniture stay with the program when paid for using operating funds, except mattresses which can stay remain with a participant

Supportive Services

Eligible Service Costs:

- Assessing service needs
- Moving Costs
- Case Management
- Child Care
- Education services
- Employment assistance or job training
- Food
- Housing Search and Counseling

- Legal services
- Life Skills Training
- Mental health services
- Outpatient health services
- Outreach services
- Substance Use Treatment services
- Transportation
- Utility Deposits

All supportive services provided must help program participants obtain and maintain housing. Any service not listed in the CoC Interim Rule is **NOT** an eligible cost.

HMIS

- Any project may use CoC Program funds to pay for staff and overhead costs directly related to contributing and maintaining data in HMIS

- Eligible costs include:
  - Purchasing or leasing computer hardware or software, and licenses
  - Leasing office space, equipment, furniture, and utilities for HMIS activities
  - Salaries, operating costs, and duties as required to operate an HMIS
  - Trainings related to the use of HMIS and associated costs
  - Paying HMIS participation fees charged by HMIS Lead

Admin

- Projects are generally allowed up to 10% administration in the overall CoC program budget

- Lane County retains 50% of admin costs for programs subcontracted

- Eligible Costs
  - General management, oversight, and coordination
  - Training on CoC Requirements
  - Environmental Review costs

- Ineligible Costs
  - Staff and overhead costs directly related to carrying out other eligible activities under the CoC Program

- Indirect Costs
  - Those that have been incurred for shared or joint objectives that cannot be identified with any particular activity

Document Check!

Do you have **eligible expense documentation** in your client files?

- Accounting of what services were paid for with CoC funds
- Accounting of what rent payments were made
- Other costs paid for with CoC funds backup

Quiz Time

Can CoC Supportive Service Funds pay for a program participant's linens and bedding to furnish a new apartment?

No.

This is not an eligible cost. Items like dishes, cookware, linens, bedding, or other consumable supplies that are used by the program participant rather than the recipient or subrecipient are not specified as eligible costs in the CoC Program Interim Rule, and therefore cannot be funded with CoC Program grants

Quiz Time

Can we provide gift cards to participants to buy food or other eligible items?

No.

Gift cards are not allowed in the CoC program. It is generally considered a risky practice as it can be difficult to document the gift card was actually spent on eligible costs. While food is an eligible cost, the program would need to purchase this with or for the participant directly.

Other Requirements

Participation from individuals experiencing homelessness:

- Must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient

- Each recipient and subrecipient of assistance must, *to the maximum extent practicable*, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.

Other Requirements

All CoC funded projects must comply with:

- Fair Housing

- VAWA

- Equal Access to Housing Final Rule

- Non-discrimination

Quiz Time

Which service activities can a CoC program participant be required to participate in?

A. Taking prescribed medications

B. Accepting case management

C. Engaging in mental health counseling

D. None of the above

B. Case Management.

Recipients and subrecipients may require that program participants participate in services that are not disability-related such as case management. However, individuals should not be terminated for a failure to participate in services or case management.

Quiz Time

Can a program participant who is evicted from a unit continue to receive rental assistance?

Yes. A program participant may be evicted from living in a property without having all assistance terminated and continue to be served in another location.

This is particularly true when providing Permanent Supportive Housing for hard-to-house populations of homeless. For these households, services may continue to be supplied by the current housing provider or the program participant may be transferred to another provider's PSH program

Coordinated Entry

- Coordinates access to resources across the CoC

- All CoC funded projects are required to fully participate in Coordinated Entry

- All referrals must come from the established Coordinated Entry based on local policies and procedures

- Assessment and Prioritization are determined locally
  - Front Door Assessment (FDA)

- Continuous improvement process

HMIS

Homeless Management Information System (HMIS)

- Lane County uses Wellsky for the HMIS

- Managed by the HMIS Lead (Lane County)

- All CoC funded projects are required to fully participate in the HMIS and enter all client level data
  - Universal Data Elements
  - Additional Program Specific Data Elements
  - Program Component Workflows

- Reporting and Data Quality
  - Annual Performance Reports (APR) must be submitted to HUD within 90 days of grant end date
  - Other: Longitudinal System Analysis (LSA); System Performance Measures (SPM); Point in Time (PIT) and Housing Inventory Count (HIC)

System Performance Measures

- The length of time individuals and families remain homeless

- The extent to which individuals and families who leave homelessness experience additional episodes of homelessness (returns to homelessness)

- Overall reduction in the number of homeless individuals and families

- Jobs and income growth for homeless individuals and families

- Reduction in the number of individuals and families who become homeless

- Successful placement from street outreach

- Successful housing placement to or retention in a permanent housing destination

CoC Standards

All CoC Programs must review and follow locally established CoC Standards:

- ✓ Core Values
- ✓ General Standards
- ✓ Program Specific Standards
- ✓ Policies
- ✓ Standard Forms

Housing First

Best Practice emphasized by HUD, the CoC and Lane County

Required under all CoC grant agreements

Homeless assistance approach that:

- Emphasizes permanent housing first without additional steps
- Does not require that people meet certain "pre-requisites" or conditions in order to access housing
- Promotes client choice in ongoing supportive services
- Utilizes a Harm Reduction framework

Housing First does not mean Housing *only*

Frequently Asked Questions

What if I get a household transferring from another CoC Program? How do I document homelessness?

Persons residing in PSH or RRH are not considered homeless, but do retain their homeless status for purposes of transferring to other PSH programs.

The program receiving a referral and entering the participant is responsible for documenting eligibility of the participant household. You may need to connect with Coordinated Entry staff and/or staff from the transferring agency to obtain documentation of homelessness/disability, etc. at original entry date.

Frequently Asked Questions

A household enrolled in my RRH program wants to add another person to the household. Is this allowed?

Yes, BUT…

There are a lot of things to consider. The household should discuss with you their plans ahead of moving another individual into the unit. Adding an individual impacts:

Eligibility

Income level and subsidy amount

Occupancy Standards

Lease

Stability

Frequently Asked Questions

I have a participant who won't keep in contact and I need them to recertify and provide updated income information. What do I do?

Participants do need to remain in contact with you during their time enrolled in the program, even if they do not want to engage in services. Multiple attempts should be made to contact through different methods (e.g. home visit, call, email, letter, etc.). If you still cannot contact, be clear in your communication about what will happen (e.g. if we do not hear back by DATE, we will terminate your enrollment by DATE) and be sure to include a method of appeal.

IMPORTANT: ALL CoC programs should have a clear termination policy and agencies should ensure they are following their policy for termination in these circumstances. Reasons for termination should be minimal and only in severe circumstances. Attempts must be made to avoid exiting an individual to homelessness.

Questions?

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Resources

CoC Interim Rule:
https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/

CoC HUD Exchange:
https://www.hudexchange.info/programs/coc/

HUD CoC Virtual Binders:

https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/

CoC Toolkit:
https://www.hudexchange.info/programs/coc/toolkit/

CoC Standards – Lane County: linked here