



CENTRAL FLORIDA  
COMMISSION ON  
HOMELESSNESS



# Central Florida Commission on Homelessness FL-507 Written Standards

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# Introduction

The Central Florida Commission on Homelessness is responsible for coordinating and implementing a regional homeless response system to meet the needs of persons experiencing or at imminent risk of homelessness within our geographic area.

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

The majority of these standards are informed by the ESG and/or HEARTH Rules, however additional standards have been established to assist the CoC in meeting State of Florida funding program guidelines, support Coordinated Entry goals, enhance CoC performance outcomes, and to help the CoC reach the goal of ending homelessness in our region. This is a living document that will evolve with regional needs and funder requirements.

These written standards have been developed in consultation with CoC and ESG recipients and with service providers. These regional partners provided input on standards, performance measures and the process for full implementation of standards throughout the CoC from the perspective of those organizations that are directly providing homeless housing and services, including Homelessness Prevention (HP), Street Outreach (SO), Emergency Shelter (ES), Transitional Housing (TH), Permanent Supportive Housing (PSH), Rapid Re-housing (RRH), and Supportive Services Only (SSO). These standards were also reviewed and approved by the CFCH Lived Experience Council and with input from the CFCH Technical Expertise Committee.

# Programs Overview

## Continuum of Care Program

The Central Florida Commission on Homelessness (CFCH, aka CoC FL-507) provides governance and strategic leadership for the Department of Housing and Urban Development's Continuum of Care Program for the Florida Counties of Orange, Osceola, and Seminole. The Lead Agency for CFCH is Homeless Services Network of Central Florida, Inc.(HSN).

The Continuum of Care Program is designed to fund projects focused on providing housing and supportive services to individuals and families experiencing homelessness. The Program is focused on helping individuals who are literally homeless as defined by HUD, and reducing first time homelessness. Projects funded through the CoC program aim to assist persons experiencing homelessness with obtaining and maintaining permanent housing, by providing the necessary wraparound services to sustain housing placement, and increase the participant's likelihood of success in the program.

## Emergency Solutions Grant Program

The ESG program is awarded to entitlement jurisdictions as well as the State of Florida through the U.S. Department of Housing and Urban Development (HUD). The State of Florida is required to distribute its portion of the grant for projects operated by local government agencies or private non-profit organizations, or the combination of both. The Florida Department of Children and Families (DCF) has chosen to have the Continuum of Care (CoC) Lead Agency, the Homeless Services Network for our region, responsible for administering the State of Florida's portion of ESG funding. ESG Funds are available annually, and awarded to Lead Agencies by DCF through a grant application process.

The purpose and design of the Federal ESG Program is to help improve the quality and quantity of emergency shelters for persons experiencing homelessness, assist with the costs associated operating emergency shelters, and to fund essential supportive services geared around homelessness prevention. ESG funds allow persons experiencing homelessness to have access to safe, sanitary, habitable, and functional shelter, paired with the services and assistance they need to improve their situations. In addition, the ESG Program focuses on homelessness prevention. ESG funds cover a variety of relocation and stabilization services, as well as short- and/or medium-term rental assistance aimed at homelessness prevention. Finally, the program can assist street outreach programs to connect unsheltered homeless persons with local housing and supportive services.

The Emergency Solutions Grant Interim Rule broadened existing emergency shelter and homelessness prevention activities, placing greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis, and/or homelessness by expanding prevention as an eligible use and adding a rapid rehousing component. The Emergency Solutions Grant is focused on assisting persons experiencing homelessness regain stability in permanent housing as quickly as possible. While traditionally ESG funds targeted

emergency shelter and homelessness prevention activities, now funds can be used for Rapid Rehousing. The interim rule updated the annual action plan requirements to include written standards for the provision of ESG assistance and performance standards for evaluating ESG activities. ESG funds can be used for a variety of services, including: Emergency Shelter, short- or medium-term Rental Assistance, Housing Search and Placement, Utility Arrears, and Housing Stability Case Management. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. The Central Florida Commission on Homelessness (CFCH, aka, CoC FL-507) is a recipient of HUD ESG Program funds eligible organizations referred to as Sub-subrecipients, administered by Homeless Services Network of Central Florida. Additionally, several entitlement jurisdictions within CFCH receive and administer ESG funds.

The funds under this program are intended to target two populations of persons facing housing instability:

- 1) Individuals and families who are currently in housing, but are at risk of becoming homeless, and in need of temporary rent or utility assistance to prevent them from becoming homeless, or assistance to move to another unit (prevention), and
- 2) Individuals and families who are experiencing homelessness, (SO, ES, TH,) and need temporary assistance in order to obtain housing and retain it (RRH).

HUD expects that these resources will be targeted and prioritized to serve households that are most in need of this temporary assistance, and are most likely to achieve stable housing, whether subsidized or unsubsidized, outside of ESG after the program concludes.

ESG assistance is not intended to provide long-term support for program participants, nor will it be able to address all of the financial and supportive services needs of households that affect housing stability. Rather, assistance should be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping them develop a plan for future housing instability.

ESG funds may be used for five program components (six eligible activities):

- Street outreach,
- Emergency shelter,
- Homelessness prevention,
- Rapid re-housing assistance, and
- Homeless Management Information Systems (HMIS); as well as
- Administrative activities.

The five program components and the eligible activities that may be funded under each are set forth in 24 CFR 576.101 through 24 CFR 576.107.

# Definitions

## Literal Homelessness

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
  - b. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
  - c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
  
2. An individual or family who will imminently lose their primary nighttime residence, provided that:
  - a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
  - b. No subsequent residence has been identified; and
  - c. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
  
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:
  - a. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - c. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and



- d. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
4. Any individual or family who:
- a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
  - b. Has no other residence; and
  - c. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

### At-Risk of Homelessness (a.k.a., Precariously Housed)

1. An individual or family who:
- i. Has an annual income below 30 percent of median family income for the area, as determined by HUD; and,
  - ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and,
  - iii. Meets one of the following conditions:
    - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
    - B. Is living in the home of another because of economic hardship;
    - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
    - D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
    - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in

which more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

- F. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
2. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
  3. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

## Other Definitions

**Chronically Homeless** – a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the “chronically homeless” definition, the individual also must have been living as described above continuously for at least 12 months, or on at least 4 separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

**Continuum of Care (CoC)** – the group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to

address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

**Emergency Shelter** – 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 which does not require occupants to sign leases or occupancy agreements.

**Homeless Management Information System (HMIS)** – the information system designated by the Continuum of Care to comply with the 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.

**Homelessness Prevention** – Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in Homeless Category 1 of Appendix A: HUD Definition for Homeless.

**Private Nonprofit Organization** – a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

**Program Participant** – an individual or family who is assisted under any CoC or ESG program. CFCH prefers not to utilize the term “Client” to describe persons participating in any project or intervention.

**Rapid Re-Housing** – Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

**Service Area** (applicable to Homelessness Prevention only) – CFCH CoC FL-507’s service area includes the entirety of Orange, Osceola and Seminole counties and cities contained within.

**Street Outreach** – Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care.

**Subrecipient** – a unit of general purpose local government or private nonprofit organization to which a recipient makes available CoC and/or ESG funds.

**Victim Service Provider** – a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

# Standards for All Project Types

## Guiding Principles

### Housing First

Housing First is a programmatic and systems approach that prioritizes providing permanent housing to people experiencing homelessness, quickly, without preconditions or service participation requirements, thus ending their homelessness, and serving as a platform from which they can pursue personal goals and improve their quality of life.

This approach is guided by the belief that people need basic necessities like food and a place to live, before attending to secondary concerns, such as getting a job, budgeting properly, or attending to substance use issues. Housing First is not, housing only. It is housing plus participant driven services, connection to mainstream resources and community integration. Housing is the foundation upon which help and healing begin for persons experiencing homelessness.

### Core Elements of Housing First at the Project Level

- Access to projects is not contingent on sobriety, minimum income requirements, lack of a criminal record (including status on the sex offender registry), completion of treatment, participation in services, status or other unnecessary conditions.
- Projects do everything possible not to reject a household on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy, and building and apartment units include special physical features that accommodate disabilities.
- Housing and service goals and plans are highly tenant-driven.
- Participation in services is voluntary and not a condition of tenancy, but can and should be used to persistently engage participants to ensure housing stability.
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants’ lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- Substance use in and of itself, without other lease violations, is not considered a reason for eviction.

## Housing Focused

Assistance provided to households at-risk of or experiencing homelessness is focused on moving to and maintaining permanent housing. Wherever possible, persons arriving at the “front door” of the homelessness emergency response system should be diverted to a permanent housing situation rather than being serviced by emergency shelters and transitional housing programs.

Diversion is a mediated, solution focused conversation to slow down the housing crisis and identify options for immediate return or rehousing with family, friends, and other permanent housing options.

When emergency shelter is the appropriate option to avoid unsafe habitation, diversion should continue with all early efforts to end the individual or family’s housing crisis as rapidly as possible. Supportive housing opportunities should be explored when diversion to permanent housing is not successful.

## No Wrong Door Coordinated Entry and Resource Prioritization

Coordinated Entry aims to help each household that experiences homelessness get the appropriate type of service intervention in the most efficient order compared to all others seeking services. Assistance is prioritized based upon level of acuity, vulnerability, severity of service needs, and length of homelessness to ensure households needing the most help receive it in a timely manner.

CFCH operates a hybrid coordinated entry process in which there is “no-wrong-door,” to access housing and services. Any provider can participate in the coordinated entry referral process. Access points are maintained throughout the tri-county area. Through 211 individuals can self-refer and are provided access to a resource specialist for diversion mediation, assessment and referral when appropriate.

## Person Centered

A trauma-informed approach that is dignified, safe, and incorporates participant choice is utilized.

- Assistance is allocated effectively and households are linked to the most appropriate intervention strategy
- Reduction in number of households experiencing homelessness
- Reduced length of time a household experiences homelessness
- Reduced returns to homelessness (recidivism)

## Strength/Asset-Based

An asset-based approach that focuses on the inherent strengths of participants, and deploys these personal strengths to aid in the achievements of the participants’ goals. Specifically:

- Every individual, group, family, and community has strengths.
- Trauma, illness, and struggle may be injurious but they may also be sources of challenge and opportunity.
- There is no limit to a person's growth, achievement, or success.
- We best serve participants by collaborating with them.
- Every environment is full of resources.
- Supportive services culture incorporates a progressive engagement model and Motivational Interviewing as a best practice for delivery of services

## HMIS Participation

Homeless Management Information System is the backbone of service coordination and collaboration. All CFCH member agencies serving persons experiencing homelessness are encouraged to contribute to a robust and open HMIS. All funded CoC and ESG projects are required to track program and client level data in HMIS. Victim Service Providers (VSP) are not required to track data through HMIS as a safety measure for survivors, however another comparable database must be maintained that meets all HMIS data standards when utilizing CoC and/or ESG funds. VSP providers should reference this HUD Decision Tree:

<https://files.hudexchange.info/resources/documents/HMIS-When-to-Use-a-Comparable-Database.pdf>

## Lived Experience and Participant Inclusion

Those with lived experiences of homelessness typically have the best understanding of the reality of our work to prevent and end homelessness--both in terms of the problems that exist, and the knowledge of the services and interventions that are the most effective solutions. To that end, it is imperative to meaningfully and intentionally integrate them into the decision-making structure of our work at both the system and program levels. When we consult the experts, service implementations are made more relevant and responsive.

CFCH will assess projects based on how meaningfully agencies engage persons with lived experience in governance, program design and evaluation.

## Access to Mainstream Resources

CoC and ESG funded projects are required to certify coordination and integration of homeless programs with other federal mainstream resources; i.e., health, social service, and employment programs for which homeless persons may be eligible. Utilizing mainstream resources ensures more CoC/ESG resources are available for housing; provides program flexibility; meets HUD match requirements; increases movement out of homelessness; and leverages other resources. Examples include:

- Medicaid
- State Children's Health Insurance Program

- VA Healthcare
- Food Stamps
- Temporary Aid for Needy Families (TANF)
- Supplemental Security Income (SSI/SSDI)
- Workforce Investment Act (WIA)

## Grievance Procedures

CFCH Lead Agency, Homeless Services Network of Central Florida, encourages clients and staff to resolve issues before they get to the formal grievance level; however, when that is not possible, the following procedures have been put into place to ensure grievances are addressed.

1. All grievances must be documented in writing and submitted to the agency's department supervisor who will address the issues specific to the grievance.
2. Client must have signed the "Permission to Release Confidential Information to Secure Necessary Services" on file at Homeless Services Network of Central Florida,
3. Grievances will only involve the client filing the grievance. The agency, Homeless Services Network of Central Florida staff will not discuss any other client's with the person filling the grievance.

Once the grievance has been documented and delivered, the agency's designated representative will review the client file and discuss the concerns with the agency's sub-contracted housing case manager. The agency's sub contracted housing case manager will call the client within 48 hours to schedule a meeting with the supervisor. Once the client agrees to the meeting, every attempt will be made to resolve the grievance. The housing case manager and client will be asked to attend this meeting.

If no resolution is reached at Homeless Services Network of Central Florida, the client may then request the CFCH Managing Board review the matter within 30 days of the grievance, When filing your written complaint or grievance, please address to: CFCH Managing Board 4064 L.B. McLeod Blvd. Orlando, Florida 32813. The CFCH Managing Board will respond within 14 days of receipt of the complaint or grievance advising you of the next step in the process. The decision of the CFCH Managing Board will be final.



# Intervention Specific Standards

## Homelessness Prevention

**Overview:** In general, CFCH encourages homelessness prevention programs to focus on serving households that would become homeless without the receipt of emergency assistance and would be completely stable in permanent housing afterwards. When communities engage in homelessness prevention services, attention to proper targeting strategies should be considered in program design. While communities have struggled to find appropriate targeting thresholds, enough evidence exists to suggest that homelessness prevention dollars that go to those easiest and most proximate to serve, are often provided to households with the capacity to self-resolve, or who are not the most likely to need eventual homelessness response services.

As funds are limited, CFCH supports programs that are strategic in serving households that are most likely to become homeless: these are usually higher barrier households with imminent housing crises who mirror those households already in emergency shelters (considering: HH income; disabilities; criminal records; past evictions; pregnancy; benefits received, TANF, etc.; number of and length of previous homeless episodes; living situation prior to homeless assistance system; employment status; HH size and composition). By targeting those households most similar to the ones already in emergency shelter for assistance, communities maximize their chances that homelessness prevention resources will return maximum results in terms of preventing future episodes of homelessness. A variety of tools and guidance has been developed by HUD and the National Alliance to End Homelessness to assist communities in targeting homeless prevention assistance.

CoC Program funds can only be used for Homeless Prevention activities in a HUD designated High Performing Communities. Services supported by these funds include housing relocation and stabilization services; short and medium term rental assistance to prevent HHs or Individuals from becoming homeless. Homelessness prevention must be administered in accordance with 24 CFR part 576.

**Emergency Solutions Grant funds Homelessness Prevention Income Requirements:** ESG limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30 percent of AMI at intake, and incomes that do not exceed 30 percent of AMI at re-evaluation (not less than once every 3 months).

### **ESG General Requirements:**

1. All client files must contain documentation on the current housing status at intake and determination of a client meeting one of the established HUD definitions of “homelessness” to help determine the type of assistance to be provided.

2. Re-assessments (or re-evaluations) are required for program participants receiving assistance.
3. Participants will have their income assessed, using 24 CFR Part 5 requirements, upon intake and every three months to ensure eligibility.
4. Case management is required at least once per month.
5. Duration of rental assistance:
  - a. Short Term - up to 3 months;
  - b. Medium term: An additional 9 months (total of 12 months including short-term assistance, and after re-evaluation).
6. Maximum Level of Assistance\* - There is a maximum level of assistance and a minimum required payment from the client.
  - a. Financial Assistance: Max of \$3,000 per household for rent deposits, moving costs, storage, utility and rent arrears;
  - b. Rental Assistance: Max of \$1,300 per household per month in combined rent and utilities;
  - c. Total max: Up to \$10,000 (not including financial assistance) over 12 months.
  - d. Minimum client contribution to rent: \$25, with subsequent increases to establish stability.
7. Landlord/Vendor Payments (rents, utilities and other payments) will be paid directly to the landlord/vendor.
  - a. Housing Inspections are required prior to clients receiving this type of ESG assistance.
  - b. Fair Housing market rates apply.
  - c. Lead-based paint remediation and disclosure applies to all ESG funded housing.

Given this context, sub-recipients who receive funding through ESG will be subject to the following coordination requirements:

- Homelessness Prevention sub-recipients are
  - Expected to require staff and volunteers who interact with clients to participate in Diversion training offered by the CoC at least once, and preferably every two years.
  - The ESG Recipient may, at its discretion, encourage or require sub-recipients providing Prevention services, to participate in the Community Resource Network— a CoC partner charged with coordination of homelessness prevention services.
- Homelessness Prevention sub-recipients should provide information programs and give assistance accessing these programs if it assists in meeting identified needs:
  - 211 – Local information hotline for social services
  - Social security benefits

- Food stamps assistance
- Affordable housing database
- Job training programs
- Health services
- Education programs
- Services for victims of domestic violence
- Veteran services

When providing homelessness prevention funding for housing, dwellings must meet ESG Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>)

**Performance Indicators for CoC Homelessness Prevention Programs:** TBD

## Street Outreach

**Target Population:** Although all homeless persons are considered a vulnerable population, street outreach activities should work to prioritize those who are extremely vulnerable (ex. Chronically homeless, unaccompanied youth, acute medical)--focusing on quality over volume of interactions.

**Eligibility: Homeless Status:** Individuals/families who meet the HUD criteria for the following definitions are eligible for Street Outreach services under ESG/CoC funding:

- Homeless Category 1: Literally Homeless
- Homeless Category 4: Fleeing/attempting to flee DV (where the individuals/families also meet the criteria for Category 1)
- In addition, individuals and families must be living on the streets or other places not meant for human habitation and be unwilling or unable to access services in an emergency shelter

**Engagement/Collaboration:** CFCH requires that agencies conducting street outreach activities must engage with unsheltered homeless persons for the purpose of providing immediate support, intervention or connections with coordinated entry and mainstream social service programs. The connection of any unsheltered person to an emergency shelter, supportive housing, and/or referral to social service agencies will serve as immediate support and intervention for housing stabilization or critical services.

Agencies are encouraged to use evidenced based practices for their street outreach efforts; including the Housing First Model that quickly connects individuals to permanent housing in the face of acute barriers to entry into housing programs. Additionally, the agencies will participate

in the CFCH street outreach working groups, registry management meetings and utilize the Coordinated Access Assessment to identify barriers to housing.

**Eligibility, Intake and Assessment:** CFCH requires that agencies conducting street outreach activities must provide individuals and families with an assessment and enter data into HMIS or a comparable database for DV providers. CFCH encourages providers to develop relationships with unsheltered homeless persons that will help connect them with emergency shelter and housing services primarily through a referral to the CFCH Coordinated Entry System.

Given this context, sub-recipients who receive funding through ESG will be subject to the following coordination requirements:

- Street Outreach sub-recipients must coordinate their services with emergency shelters and CES whenever possible, including:
  - Reviewing HMIS to determine if unsheltered persons have already used services within the homeless crisis response system
  - Ensure adequate information about families with children is in HMIS so that the Family Shelter Prioritization Tool can be used to assess prioritization for family shelter beds
  - Refer individuals to emergency shelters to meet immediate needs
  - Refer veterans to veterans outreach staff for confirmation of veteran status and linkage to VA funded emergency shelter beds.

**Performance Indicators for CoC Street Outreach Programs: TBD**

## Emergency Shelter

CFCH has established minimum standards that align with ESG Program interim rule establishing safety, sanitation, and privacy in emergency shelters funded operating within the CoC and/or are funded with ESG, and minimum habitability standards for permanent housing funded under the Rapid-Rehousing and Homeless Prevention components of ESG.

CFCH and its contracted emergency housing organizations provide the following services to facilitate self-sufficiency and independence:

- Safe, temporary emergency shelter in partnership with the coordinated entry and assessment policies and procedures;
- Housing-focused, person-centered, strength-based, trauma informed case management services;
- Assistance with obtaining housing;
- Referrals to supportive services for special populations such as children, clients with disabilities, clients with behavioral health needs, veterans, etc.;
- Participating in the CFCH HMIS directly or through data merging. and

- Providing services in compliance with the equal access rule and in alignment with CFCH policy on Gender Inclusion and Non-Discrimination [https://www.cfch.org/wp-content/uploads/2020/04/Policy-on-Gender-Inclusion-and-Sexual-Orientation-Non-Discrim\\_Draft-Presented-for-Approval.docx](https://www.cfch.org/wp-content/uploads/2020/04/Policy-on-Gender-Inclusion-and-Sexual-Orientation-Non-Discrim_Draft-Presented-for-Approval.docx)

**Eligibility: Homeless Status:** Homeless clients entering into the shelter system must meet the HUD criteria for homelessness as either literally homeless (Homeless Category 1), at imminent risk of homelessness (Homeless Category 2), homeless under another federal statute (Homeless Category 3), or fleeing/attempting to flee domestic violence (Homeless Category 4).

**Diversion, Intake and Assessment:** Whenever possible, shelters will provide all persons at the emergency shelter front door with a housing-focused conversation identifying possible opportunities to avoid entering (Diversion) the emergency response system and returning to housing permanency as quickly as possible. Diversion is a guided conversational mediation strategy to slow down the housing crisis with an individual and/or household to identify potential strengths and capacities that exist to end their episode of homelessness through family reunification, conflict resolutions, return to previous housing situation, or identifying other possible safe housing situations. Diversion can be a successful strategy with or without flexible financial assistance to provide rent arrears, housing deposits, groceries, gas, transportation, etc.

**Rapid Exit:** Housing-focused mediation should not stop upon intake into emergency shelters. Assertive and active engagement in finding housing solutions for clients should be explored before assessing persons for community-wide supportive housing resources.

**Coordinated Access Assessment:** CFCH Emergency Shelters will use the continuum-wide assessment tool to review client situations, understand eligibility, and begin the process of determining length of assistance. The tool will include an assessment form for diversion that providers are currently testing. Once testing has been finalized, the diversion assessment will be required for all providers, including DV providers. Providers must enter data into HMIS or a comparable database for DV providers. CFCH currently utilizes the IV-SPDAT as an assessment tool.

**Equal Access:** Shelters are required to comply with HUDs Equal Access Rule. All emergency shelters, for families, youth or individuals, must comply with the CFCH *Policy on Gender Inclusion and Non-Discrimination with Respect to Sexual Orientation or Gender Identity* as found at <https://www.centralfloridacoc.org/standards-and-policies>.

**ESG Emergency Shelter Standards:** ESG funded **family shelter policies and procedures** are dependent upon participation in the Coordinated Entry System.

*a. Admission*

Admission into ESG funded family shelters is predicated on use of the CES Shelter Matching Tool. This tool is used to prioritize families seeking shelter. The tool can be used in conjunction with a Regional Big 3 (HMIS entry/exit, Family VI-SPDAT, Release of

Information), but it is not required that a family complete the Big 3 to enter shelter. Instead, the need is for the family to have a signed Release of Information and must be matched with shelter, based on their designation with the CES Shelter Matching Tool.

Information for the Shelter Matching Tool should be completed by all families expressing an interest in shelter. It should be filled out by the Head of Household. The Shelter Matching Tool can be completed by any access point that assesses families, including, but not limited to CES HUBs.

Causes of denial of assistance include, but are not limited to, the household's ineligibility or failure to provide verifiable evidence of eligibility, etc. Established procedures should describe:

1. Circumstances in which the household may not qualify or would be denied;
2. Notification of denial; and
3. A household's right to review the decision.

Every effort must be made to shelter families as a single unit. Gender, sex, and/or age of children under age 18 must not be used as a basis for denying any family's admission to an emergency shelter assisted with ESG funding.

*b. Diversion*

The Diversion conversation is the first intervention provided to any client who presents with a housing need regardless of eligibility of population type. Diversion should be attempted at every access point, at every phase and stage.

*c. Referral*

The CES Matching Tool is an assessment in HMIS and will populate onto a Report Writer Report. CES will prioritize families on the report by the agreed upon community prioritization factors for shelter and send it to the shelter providers when the provider indicates availability. Shelters will call down the provided list to fill any shelter availability.

Families residing in shelter will be engaged with a Diversion conversation for up to 30 days. If the family is still residing in shelter after 30 days with no exit strategy, the shelter will complete a Family VI SPDAT to initiate the referral for Rapid ReHousing.

*d. Discharge*

Subrecipients must have written termination, denial and grievance policies and/or procedures. The policies and/or procedures should be readily available to households either in written

information or by posting the policy in a public space. It is important to effectively communicate these policies and/or procedures to households and ensure that they are fully understood.

*e. Length of stay if any*

Since each emergency shelter has a unique role in the regional homeless services system, subrecipients are allowed to establish their own policies regarding length of stay. However, all subrecipients are required to participate in the Shelter Work Group and participate in the establishment of system-wide baselines and benchmarks for HUD system performance measures including length of stay, returns to homelessness and increase in income.

*f. Safeguards to meet safety and shelter needs of special populations (DV)*

All subrecipients must participate in CoC workgroups and/or committees that are exploring race equity and comply with any standards, policies and procedures that develop from those groups and are approved by the CoC Board.

All clients seeking services who meet Category IV of the homeless definition (domestic violence and human trafficking) should first be referred to emergency shelters that specialize in serving persons feelings domestic violence or human trafficking.

All subrecipient shelters, whether they specialize in Category IV homelessness or not, will require relevant staff to receive training in Confidentiality/Privacy, HIPAA & Professional Ethics as well as Domestic Violence Safety Planning.

Subrecipients must have policies and/or procedures to ensure that client records are maintained in a confidential manner and keep written records or fields pertaining to households under lock and key with designated personnel granted access to those files. Subrecipients must also comply with HMIS policies and procedures related to notifying the HMIS lead agency of any employees or volunteers who have an HMIS license and leave the employment/volunteer service of the subrecipient. HMIS policies and procedures can be found at: <https://www.cfch.org/wp-content/uploads/2020/04/Central-Florida-Continuum-of-Care-HMIS-Policies-and-Procedures-Manual-current-July-2017.pdf>

Emergency Shelters and Rapid ReHousing projects must comply with Emergency Transfer plans for victims of domestic violence or human trafficking.

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

Emergency shelter subrecipient assessment will include completion of HMIS entry/exit, release of information and appropriate VI-SPDAT.

Prioritization for family shelter will be completed using the Shelter Prioritization Tool and the referral work flow established by CES.

Income eligibility does not need to be assessed for program participants under Street outreach, Emergency Shelter or at initial intake for the Rapid ReHousing component of ESG.

Emergency shelter clients will have a re-evaluation done at least once in the first year and annually thereafter, confirming that the household lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Third party verification for eligibility is the preferred method.

Emergency shelters serving families or youth must complete a Housing Plan with any program participant who has resided in the shelter for at least 30 days. These plans should be updated at least quarterly. Emergency shelters serving individuals must complete a Housing Plan for any program participant who has resided in the shelter for at least 3 months, and the plan should be updated at least quarterly. Copies of the plan should be kept in the client file.

**2) Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing assistance providers; other homeless assistance providers; and mainstream service and housing providers**

Coordination among service providers occurs primarily through CES for housing assistance. Exceptions are made for individuals who show up to emergency shelters on their own; these individuals may be screened and served without first going through centralized intake. Similarly, victims of domestic violence who make contact with domestic violence shelters independently may also be screened and served without first going through centralized intake.

Additional coordination is accomplished through project-type work groups, including shelter, rapid rehousing, permanent supportive housing, veterans services and youth services. Any ESG funded agencies are required to participate in these CoC-wide project type workgroups.

Given this context, sub-recipients who receive funding through ESG will be subject to the following coordination requirements:

- **Emergency Shelter** sub-recipients serving families or youth must coordinate with Rapid ReHousing providers to ensure Navigation and Rapid ReHousing case managers have access to clients who have been referred to Navigation or Rapid ReHousing through CES.
- Emergency Shelters should all provide information programs, and give assistance accessing these programs, if it assists in meeting identified needs:



- 211 – Local information hotline for social services
- Social security benefits
- Food stamps assistance
- Affordable housing database
- Job training programs
- Health services
- Education programs
- Services for victims of domestic violence
- Veteran services

### Shelter Habitability

Emergency shelter providers must meet ESG Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>) and should be inspected at least once every five years or upon request.

Private sector hotel/motel buildings being used as bridge housing through payment for standard hotel occupancy for individual rooms must comply with all local building codes and habitability standards as documented by a valid certificate of occupancy visible in a public space of the building(s) or upon request.

**Performance Indicators for CoC Emergency Shelter Programs:** TBD

## Transitional Housing

Transitional housing is temporary supportive housing used to facilitate the movement of households experiencing homelessness to permanent housing. While CFCH currently only funds transitional housing programs serving youth, all transitional housing programs are encouraged to align programming with the regional guiding principles (including: TH projects serving Veterans, youth age 18-24, DV/HT survivors, and substance users).

**Eligibility:** CFCH funded transitional housing projects must follow any additional eligibility criteria set forth in the HUD CoC NOFA through which a project was funded and the grant agreement.

**Minimum Standards for Transitional Housing Assistance:** All referrals to transitional housing and assessment for type and level of services must come through CFCH's coordinated entry process. The following minimum standards will be applied to all transitional housing programs:

- Assistance in transitioning to permanent housing must be made available/provided as early as possible.
- Supportive services are offered throughout the duration of the stay in transitional housing.
- Participants in transitional housing must enter into a lease, sublease or occupancy agreement for the term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum of 24 months.

Unless otherwise prohibited by other project funding sources, transitional housing projects are encouraged to utilize a low barrier Housing First Approach (i.e., not have service participation requirements or preconditions to entry, such as sobriety or minimum income threshold), and must prioritize rapid placement and stabilization in permanent housing.

Transitional Housing providers should provide information programs and give assistance accessing these programs if it assists in meeting identified needs:

- 211 – Local information hotline for social services
- Social security benefits
- Food stamps assistance
- Affordable housing database
- Job training programs
- Health services
- Education programs
- Services for victims of domestic violence
- Veteran services

Transitional Housing providers must meet ESG Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>) and should be inspected at least once every five years or upon request.

**Performance Indicators for CoC Transitional Housing: TBD**

## Rapid Rehousing

Rapid Re-Housing is available to help those who are experiencing homelessness be quickly and permanently housed. Rapid Re-Housing Projects (RRH) provides housing relocation and stabilization services, and short or medium-term rental assistance as needed to help households experiencing homelessness move as quickly as possible to permanent housing and achieve stability in that housing

**Eligibility:** Must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement

Minimum Standards for Rapid Re-Housing Assistance:

- Maximum participation in a rapid re-housing program cannot exceed 24 months in any three year period
- Supportive services must be offered throughout the duration of stay in housing  
Participants are required to meet with a Housing Stability Case Manager not less than once per month to assist the participant in ensuring long-term housing stability
- Participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party
- Must re-evaluate quarterly that the participant lacks sufficient resources and support networks necessary to retain housing without assistance.
- Rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent established by HUD, and complies with HUD's standard of rent reasonableness
- Rapid ReHousing program participants will be reassessed annually to determine that income is not greater than 30% of AMI, as established by HUD. Subrecipients will use 24 CFR Part 5 definitions for calculating annual income.

### Determining Rental Assistance Limits:

Given this context, sub-recipients who receive funding through ESG will be subject to the following coordination requirements:

- Rapid ReHousing subrecipients are expected to
  - Use CES to receive all referrals and comply with CES workflow using forms and documents found at [www.hsncl.org/rapid-rehousing](http://www.hsncl.org/rapid-rehousing)
  - Refer eligible families to 4-C Child Care services

- Refer eligible families to mainstream resources including, but not limited to TANF, food stamps, 4-C, Head Start, medicaid, SOAR, food pantries, Mustard Seed, Goodwill and Careersource
- Rapid ReHousing should all provide information programs and give assistance accessing these programs if it assists in meeting identified needs:
  - 211 – Local information hotline for social services
  - Social security benefits
  - Food stamps assistance
  - Affordable housing database
  - Job training programs
  - Health services
  - Education programs
  - Services for victims of domestic violence
  - Veteran services

Rapid Rehousing providers must ensure dwellings meet ESG Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>) and should be inspected at least once every five years or upon request. Additionally, all funded permanent housing units are subject to a Housing Quality Standards (HQS) inspection.

**Performance Indicators for CoC Rapid Re-Housing Programs: TBD**

## Permanent Supportive Housing

Permanent supportive housing (PSH) for persons with disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or children member with a disability achieve housing stability.

Organizations must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs.

CoC Program-funded PSH organizations are required by grant agreement to follow a Housing First approach to the maximum extent practicable. A household experiencing chronic

homelessness should not be forced to refuse an offer of PSH, if the household does not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs.

**Order of Priority for Permanent Supportive Housing Assistance:** CES supports many 507-FL-CoC funded and non-funded agencies in Permanent Supportive Housing (PSH) Projects. These PSH Projects are intended to target homeless individuals and families who are the most vulnerable and have experienced chronic homelessness, as defined by HUD Notice CPD-16-11 Issued 7-25-16. Homeless persons can access CES via 2-1-1, Emergency Shelters, Outreach, HUBs, and other HMIS homeless providers participating in the CES. Homeless persons are screened for diversion or prevention. Homeless persons are assessed using a comprehensive, standard assessment tool called "The Big 3" (Release of Information, HMIS Entry Assessment and VI-SPDAT). The VI-SPDAT is the standard assessment tool utilized to evaluate vulnerability. Data match resources can also be utilized, such as jail records, medical discharge records, etc.

### *Prioritization for Assignment to Navigation*

Assessed persons populate onto a single prioritized list, referred to as The Registry. Based on their length of homelessness and severity of service needs, prioritized persons are assigned a Navigator to verify eligibility and obtain documents required by PSH projects. A Navigator's main role is to get homeless persons "document ready," typically for PSH Programs an ID, social, income verification, disability verification, and verified chronic homelessness, as defined by HUD. Once person is "document ready" Navigators submit a referral to CES Match.

### *Eligibility and Record Keeping Review*

In order for the person to be eligible for a program, the criteria must be met and proper documentation must be provided. The chronic definition of homelessness and a certified disability are the main two criterions for eligibility. The person must have 12 consecutive or cumulative months of homelessness within the past 3 years (staying in the streets or in shelters) which must be verified through HMIS or a third-party service provider. In addition, the person's disability must be verified by a licensed medical provider or by using a copy of the SSI/SSDI letter if receiving assistance due to a disabling condition. The proper identification documentation must be provided as well. Once a Navigator has uploaded all required documents needed for program eligibility, they submit a referral in HMIS to the CES Match team. The CES Match team reviews each person's HMIS profile to verify eligibility documents are valid and to match persons to the most appropriate housing program for which they are eligible for.

### *Prioritization for Assignment to Case Management and Housing*

Once approved and matched to PSH Programs, persons will populate on an Approved List, much like The Registry mentioned above. Persons are prioritized based on HUDs guidance; first, length of homelessness and second, severity of needs, based on the VI-SPDAT tool. Prioritized persons are then matched to PSH Housing Stability Case Managers based on program capacity, and are then referred to the PSH providers using HMIS. PSH providers finalize housing placement with the Housing Locator Team and provide ongoing voluntary Case Management services in compliance with Housing First. Providers are required to ensure that barriers remain low in partnership with the CES process, that housing is accessed rapidly, and that participant choice is prioritized during housing search and with regards to participation in services.

### **Minimum Standards for Permanent Supportive Housing:**

- There can be no predetermined length of stay for a PSH project.
- Supportive services designed to meet the needs of the participants must be made available to the participants throughout the duration of stay in PSH.
- Participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.
- Organizations that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a participant's assistance is terminated only in the most severe cases.

In an effort to align standards across program types, all Permanent Supportive Housing providers must ensure dwellings meet ESG Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>) and should be inspected at least once every five years or upon request. Additionally, all CFCH funded permanent housing units are subject to a Housing Quality Standards (HQS) inspection.

**Performance Indicators for CoC Permanent Supportive Housing Programs: TBD**

## HMIS

All CoC and ESG funded projects must enter client-level data into HMIS, and comply with [HMIS Policies and Procedures](#) and workflows. HMIS Policies and Procedures can be found at:

- CFCH CoC FL-507 HMIS Policies Handbook <https://www.hmiscfl.org/hmis-governance/policies/>
- HMIS Privacy and Security Plan <https://www.hmiscfl.org/privacy-security/>

- HMIS Privacy Notice <https://www.hmiscfl.org/hmis-privacy-notice/>

Victim Service agencies are not allowed to enter data into HMIS. Instead, these agencies must use a comparable data system, and provide aggregate data to the CoC for documentation related to system performance measures, Point in Time Count, and the Housing Inventory Chart. Victim Service agencies will be required to certify that their comparable data base meets HMIS standards as established by HUD.

<https://www.cfch.org/wp-content/uploads/2020/12/Central-Florida-CoC-HMIS-Policies-2019-FINAL-Board-Approved.pdf>

## Program Component Chart

Program Component	Description	Essential Program Elements	Who is it appropriate for?	Eligibility Criteria
<b>Prevention</b>	Activities or programs designed to prevent the incidence of homelessness	-Up to 24 months of rental assistance; -Deposit; -Utilities; assistance; -Rent arrears;	One of the following: - Doubled Up due to economic reasons. -Fleeing DV. - Within 21 days of eviction (written notice) -Moved 2x in 6 month period	-Pay 30% of income. - Anticipation of increased earned or other income. - Participation in CM. -Apply for eligible mainstream resources
<b>Homeless Outreach</b>	Activities or programs designed to connect unsheltered persons with housing and service resources to end a person's episode of homelessness	-Training in Trauma Informed Care; Motivational Interviewing; Harm reduction -Access to coordinated entry services -Assessment	Unsheltered persons experiencing homelessness (streets, cars, encampments, and other spaces unfit for human habitation)	Cat. 1 & 4 homelessness
<b>Diversion</b>	Activities or programs designed to ensure literally homeless persons do not utilize the ES/TH but instead restore or retain a	-Housing crisis mediation -Flexible financial assistance -Family unification	Immediate intervention for newly homeless persons and/or those who only recently engaged with the homelessness	All persons newly experiencing homeless regardless of initial agency/program contact

	housing solution		emergency response system	
<b>Rapid Exit / Extended Diversion</b>	Activities or programs that engage emergency shelter guests to quickly restore or retain new housing solutions without use of supportive housing resources	-Housing crisis mediation -Flexible financial assistance -Family unification -Emergency Shelter 1-30 days	Persons who are newly homeless who are placed in Emergency Shelter/Bridge Housing pending Rapid placement in permanent housing.	Cat 1 & 4 homelessness
<b>Emergency Shelter</b>	Facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for homeless persons. Includes linkage to housing-focused services; is short-term intervention with ongoing assessment based on progress. Ideally less than 45 days.	-Housing Focused Case Management 1x/week (Housing plan, barriers assessment, money management, goal setting, ongoing assessment) - Referral for mainstream services (MH, Medical, Housing, Transportation, Employment, training, Social Service, Child Care, CDO - Transportation Assistance - Showers -Laundry -On-site Meals -Telephone & internet access - Safe sleeping - Diversion/Rapid Exit -Equal access -Low barrier entry	Individuals and families experiencing homelessness for whom diversion/rapid exit was unsuccessful	-Cat 1 & 4 Homelessness -No other supports (DV) or insufficient resources to secure housing -Required to engage housing planning
<b>Non-Congregate Shelter / Bridge Housing</b>	Temporary housing or shelter (typically in a hotel)	-Voucher for a motel or hotel. -Referrals to mainstream resources. -Diversion -Access to private washroom/showers.	-Any seeking shelter known to be without safe and secure overnight sleeping accommodations and cannot access or are not eligible for emergency	-Cat 1 & 4 Homelessness -No other supports (DV) or insufficient resources to secure housing -Required to engage housing



		-Provision or referral for meal	shelter -Supportive Housing enrollment with immanent move-in date	planning
<b>Domestic Violence Shelter</b>	Temporary housing or shelter and support for persons escaping violent or abusive situations. Includes linkage to services and coordinated entry for CoC supportive housing opportunities.	-Short term Crisis shelter -1-3 nights Hotel voucher when a shelter bed is not available or appropriate and when funding is available. -DV related Advocacy and supportive services. -Referral and arrangement for transportation to other shelters. -Meals. -Personal hygiene and clothing (emergency care items). -Individual and group support -Linkage to housing and mainstream services.	Persons seeking immediate shelter from violent or abusive situations	-Victim of DV. -18 years or older.
<b>Transitional Housing</b>	Facilities the movement of homeless persons and families to permanent housing. Homeless persons may live in transitional housing for up to 24 months and receive supportive services such as substance use recovery, childcare, job training, and home furnishings that help them live	-Rental assistance up to 24 months -Permanent Housing offered throughout program duration -Case management-changes in frequency and intensity determined by individual needs. Recommend starting more frequently as least every two weeks initially -Utility assistance	-Individuals with low to moderate exiting homelessness and entering permanent or transitional housing services (esp. Youth) -Homeless persons exiting shelter -Persons who will be successful w/short-term assistance -Capacity to increase income/skills	-Ages 16+ - Homeless or eviction notice - Exiting jail or tx with no housing options - Participate in CM - Housing stability plan (self-directed) that addresses barriers

	more independently.	-Pay >=30% of income to towards housing unless special circumstances exist -Link to mainstream resources -	-Persons unable to afford housing w/income without public housing assistance	
<b>Rapid Rehousing (CoC)</b>	Housing and related supportive services for persons moving from homelessness to housing permanency. Housing subsidy and services are limi	-Short-term to medium-term rent or utility subsidies to obtain and maintain housing; -Housing Stability Case Management -Security deposits or first month's rent to help homeless households move to an apartment; - Mediation/Advocacy programs for landlord-tenant disputes; - Education and training services (financial literacy, life skills, tenant education) - Financial assistance for basic needs or employment/education/transportation -Linkage to other services & mainstream resources	Individuals with low to moderate barriers exiting homelessness and who have a strong chance of increasing their income and stabilizing their housing with short (2 month-6 months) to medium (7-12 months) length support	
<b>Rapid Rehousing (ESG)</b>	Housing and related supportive services for literally homeless persons moving from homelessness to lease-termed	-Short to medium-term rent subsidies to obtain and maintain housing; -Security deposits or first month's rent;	Individuals with low to moderate barriers exiting homelessness and who have a strong chance of increasing their income and	

	permanent housing situation with time-limited rental assistance up to 24 months- with linkage to other mainstream services	- Mediation/Advocacy programs for landlord-tenant disputes; -Supportive services (ie, Case Management; -Limited flexible financial assistance;	stabilizing their housing with short (2 month-6 months) to medium (7-12 months) to special circumstances (13-24 months) length support	
Permanent Supportive Housing (VASH, S+C, HUD PSH)	Housing and supportive services to achieve housing stability for chronically homeless persons	Long term rental assistance, case management and supportive services	-Individuals experiencing chronic homelessness with a disability or families with an adult or child member with a disability	Individual has lived in the following places (either consecutively for 12 months or 4 episodes in the last 3 years totaling 12 months): -Emergency shelter -Place not meant for habitation -Institutional Care Facility for 89 days or less and entered from streets/emergency shelter

## Coordinated Entry and Assessment

The Coordinated Entry System (CES) is a way for all CFCH homeless services providers to work together with a “no wrong door” approach to provide services to our homeless neighbors. The main goal of CES is to create a real time list of individuals experiencing homelessness in our community, then quickly and efficiently match those people to case management services, available housing, and other resources. We use evidence-based tools to systematically end homelessness. Within that process we are using universal tools and forms that will help ensure that those who are most vulnerable will get housed as quickly as possible.

CES is partnering with community agencies like health care providers, the public school systems, correctional facilities, homeless services providers, and many others to better prioritize those with the greatest needs. Persons experiencing homelessness can be assessed by going to community access points, community HUBs, calling 2-1-1, meeting with outreach workers on

the streets, or by seeking services at other agencies participating in CES in the tri-county area.  
Core Components

The CES is made up of seven key components;

1. Use of “The Big 3”—Release of Information, Entry Assessment in HMIS, and the VI-SPDAT (Vulnerability Index – Service Prioritization and Decision Assistance Tool)
2. Community Navigation to assist folks in getting “document ready” for a housing program
3. Referrals in HMIS, Eligibility Review (record keeping review), and Matching to appropriate housing programs
4. Referrals to Partner Agencies for approved participants to gain a Housing Stability Case Manager
5. Housing Search and Match, based on Participant Choice and Housing First
6. Housing Stability and re-entry into the Community
7. Data Sharing and Partner Communication

**Targeted Populations:** The Coordinated Entry System is open to all who meet the HUD definition of homeless, as outlined in the new HEARTH Act regulations, and have incomes below 50% of the Area Median Income. The system uses the person’s level of vulnerability (described in Definitions) and length of homelessness to determine priority for housing and supportive services. The person with the highest priority is offered housing and supportive services first.

More directly, applicants may be offered housing regardless of vulnerability score, but the more vulnerable persons will likely be offered housing before the non-vulnerable.

CoC prioritized sub-populations include;

1. Chronically homeless individuals
2. Veterans
3. Families, with children under the age of 18
4. Transitional-Aged Unaccompanied Youth

**Disclaimer:** The Coordinated Entry System is designed to assess eligibility for housing programs targeted to homeless persons. It is not a guarantee that the individual will meet the final eligibility requirements for - or receive a referral to - a particular housing option. The CES is not a stand-alone solution to end homelessness or a solution to the shortage of affordable housing. The CES supports the purpose of 507 CoC: to facilitate a comprehensive and integrated system of services in Central Florida designed to ensure that any experience of homelessness is rare, brief, and singular. Orange, Osceola and Seminole Counties are committed to ending homelessness through sharing expertise, using data to inform practice, monitoring system performance, and using our collective voice to advocate for our homeless neighbors.

## Workflow:

**Access:** Homeless persons can gain access into the Coordinated Entry System through Street Outreach workers, Shelters, participating community partners serving as Access Points, Community HUBS, or by calling 211. Currently the tri-county area is fully covered with HUBs, 1 in Seminole County, 3 in Orange County, and 2 in Osceola County. HUB information is advertised to all community partners via website, meetings, and e-blasts. 211 covers the tri county area 24/7. Partnering with 211 is critical to ensure emergency access to those in need of services when the CES is not operating. Street Outreach teams are located in each county as well, to ensure access to those living on the streets who are least likely to access services or seek out assistance.

**Assess:** Participating service providers gather information on people's needs, preferences, and the barriers they face to regaining housing by administering a standardized assessment, referred to as The Big 3. This standard assessment includes consent via the Release of Information, gathering basic household data via the HMIS CoC Entry, and gauging the vulnerability through administering the VI-SPDAT.)

**Navigation:** Once the assessment has identified the most vulnerable people with the highest needs, they are prioritized on a by-name list or registry. Service Providers meet weekly to review the by-name registry, where Community Navigators are assigned to the most vulnerable based on length of homelessness and VI-SPDAT score. Navigators then work with persons to discuss housing goals, and to verify eligibility for persons interested in housing. Navigators help persons secure the needed documents for Housing Program eligibility (i.e.: ID, social security card, etc.) as well as refer out to other community resources.

**Referral:** Once the person has all documents in order, the Community Navigator will make a referral in HMIS to CES Match.

**CES Match:** The CES team reviews the referral and person's eligibility. CES team will make a determination on eligibility and what program would best fit the client's needs, using the VI-SPDAT to guide the matching process.

Once a client is approved for a Housing Program, they are reviewed weekly at Provider meetings to be prioritized for programs that have capacity. Participants are referred to programs with capacity, again prioritized based on length of time homeless and VI-SPDAT score. They are connected to a Housing Stability Case Manager who begins working with the participant on housing goals.

**Housing Search:** The participant and their Housing Case Manager complete a Housing Needs form to guide the housing match process and to identify housing barriers. CES sends a referral to the Housing Locator Team to begin the search for a unit that meets the needs of the household.

Full Coordinated Entry Policies and Procedures can be found here: [https://www.cfch.org/wp-content/uploads/2020/04/2018-Policies-and-Procedures -FINAL-Version.2019-1.pdf](https://www.cfch.org/wp-content/uploads/2020/04/2018-Policies-and-Procedures-FINAL-Version.2019-1.pdf)

## Disaster Preparedness

CFCH Disaster Preparedness guide can be found here: [https://www.centralfloridacoc.org/wp-content/uploads/2018/07/CoC-Disaster-Plan-Draft-v4-7\\_24\\_18.docx](https://www.centralfloridacoc.org/wp-content/uploads/2018/07/CoC-Disaster-Plan-Draft-v4-7_24_18.docx)

## Other Standards

### Conflicts of Interest

Subrecipients must avoid any conflict of interest in carrying out activities funded by the CoC program and ESG.

#### **Organizational Conflicts of Interest:**

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the sub-recipient, or a parent or subsidiary of the sub-recipient. Subrecipients must not conduct initial evaluation or provide homelessness prevention assistance to persons living in property owned by the subrecipient or parent/subsidiary of the subrecipient.

#### **Individual Conflicts of Interest:**

Recipients and subrecipients must comply with HUD's Administration requirements (24 CFR 85.36 or 84.42 for procurement of goods and services. For all other transactions and activities:

- Restrictions on financial interests and benefits apply to employees, agents, consultants, officers and elected or appointed officials of the recipient or subrecipient if they have certain types of responsible positions.
- Restrictions pertain to financial gain for self, family or those with business ties.

Exceptions: Upon written request by the recipient, HUD may grant exceptions on a case by case basis. (see 24 CFR 576.404(b)(3)(ii))

## Fair Housing & Civil Rights Requirements

Agencies must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a). In addition, agencies must make known that ESG rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about ESG and equal access to the financial assistance and services provided

under this program. Among other things, this means that each subgrantee must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to H-ESG assistance. In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6.

If the procedures that the agency intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such rental assistance and services, the agency must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

Under section 808(e)(5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD requires the same of its funding recipients. Agencies will have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. Examples of affirmatively furthering fair housing include: (1) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (2) making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities (see, for example, HUD's rule on effective communications at 24 CFR 8.6); (3) providing fair housing counseling services or referrals to fair housing agencies; (4) Informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the HUD Housing Discrimination Hotline: 1-800-669-9777; and (5) recruiting landlords and service providers in areas that expand housing choice to program participants.

## Equal Participation of Religious Organizations

Agencies that are religious or faith-based are eligible, on the same basis as any other organization, to participate in ESG. Neither the federal government nor a grantee shall discriminate against an organization on the basis of the organization's religious character or affiliation.

Agencies that are directly funded under ESG may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for the program participants.

A religious organization that participates in ESG will retain its independence from federal, state, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that it does not use direct ESG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, a ESG-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

Agencies that participate in the ESG program shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

## Lobbying and Disclosure Requirements

The disclosure requirements and prohibitions of section 319 of the Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 1990 (31 U.S.C. 1352) (the Byrd Amendment), and implementing regulations at 24 CFR part 87, apply to H-ESG. Applicants must disclose, using Standard Form LLL (SF-LLL), "Disclosure of Lobbying Activities," any funds, other than federally appropriated funds, that will be or have been used to influence federal employees, members of Congress, or congressional staff regarding specific grants or contracts.

## Drug-Free Workplace Requirements

The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD's implementing regulations at 24 CFR part 21 apply to ESG.

## Sub-Recipient Policies and Procedures

Each sub-recipients of CoC and ESG funds must also create agency level policies and procedures to include, but not limited to:

- Admission criteria (program eligibility, required documentation, use of CES)
- Shelter stay (length of stay; involuntary family separation; case management and other services; meeting safety and shelter needs of special population; assessing; prioritizing; and reassessing individuals' and families' needs for essential services related to emergency shelter, etc.)
- Additional requirements (use of HMIS; recordkeeping; coordination among other providers of services for homeless individuals and families, etc.)
- Discharge and termination procedures (required documentation; file closing; grievance procedures, etc.)
- Requirement for person with lived experience to serve on Board of Directors



Policies and procedures should also address Nondiscrimination and Equal Opportunity Requirements, Fair Housing, Lead Based Paint Requirements, Lobbying and Disclosure requirements and Drug-free Workplace Requirements.

## Appendices: Other Relevant CFCH (CoC FL-507) Policies and Procedures

Appendix 1:

Appendix 2:

### Appendix 3: Coronavirus Relief Standards

The regular CoC Written Standard remains in effect during the period of relief and response to the COVID19 pandemic. The following Coronavirus relief standards constitute additional guidance and waivers enacted at the discretion of the CFCH Managing Board, and should be used appropriately based upon funding specific requirements and waivers granted to the CoC and State of Florida Department of Families.

**Guidance from Center for Disease Control and Prevention (CDC):** CFCH programs and projects shall follow recommendations established by the CDC for people at increased risk of severe illness when contracting COVID-19. This includes, but is not limited to, the following activities: Homelessness Prevention, Street Outreach, Emergency Shelter, Transitional Housing, RRH, and PSH. <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/index.html>

**Coordinated Entry Assessment:** During the period of relief and response to the COVID-19 pandemic, the CoC shall prioritize resources based upon risk factors for people at increased risk of severe illness when contracting COVID-19. For the purposes of assessing eligibility and prioritizing supportive housing resources, CFCH partners and sub-recipients will utilize the COVID Screening Tool. The efficacy of this screening tool will be reviewed periodically to ensure equitable service delivery based upon performance measures set by the CFCH Managing Board

**Homeless Certification:** For the purposes of certifying homeless during the Coronavirus Pandemic as self-certification of homelessness will be deemed acceptable.

**Emergency Shelter Operations:** Emergency Shelter providers receiving ESG funds must insure compliance with HUD guidelines on Shelter Management During an Infectious Disease

Outbreak. [Shelter Management During an Infectious Disease Outbreak](https://files.hudexchange.info/resources/documents/COVID-19-Shelter-Management-During-an-Infectious-Disease-Outbreak.pdf)  
[Diseasehttps://files.hudexchange.info/resources/documents/COVID-19-Shelter-Management-During-an-Infectious-Disease-Outbreak.pdf](https://files.hudexchange.info/resources/documents/COVID-19-Shelter-Management-During-an-Infectious-Disease-Outbreak.pdf)

**RRH Length of Participation:** In regards to length of participation in a Rapid-Rehousing program, extension may be granted up for the purposes of maintaining housing stability. The 12-month limit has been waived, and at the CoC's discretion, program adjustments may be considered within the limits of funding requirements.

**Income Documentation:** In order to provide maximum flexibility in navigating homeless persons into housing during the Coronavirus pandemic, formal income verification may be waived prior to program assignment and navigation. Income documentation shall be completed within 90 days of the housing move-in date.

**All Available HUD Waivers:** The CoC, as determined by the CFCH Managing Board, will utilize all available HUD waivers at its sole discretion to insure maximum ability to provide housing stability.

**Eligible ESG Funded Activities:** Under the CARES Act, ESG Funds may be used for the following activities. Activities are to serve the purposes of preventing, preparing, and responding to the COVID-19.

<p><u>Activities</u></p>	<p>ESG-CV Notice Guidance  <a href="https://www.hud.gov/sites/dfiles/OCHCO/documents/20-08cpdn.pdf">https://www.hud.gov/sites/dfiles/OCHCO/documents/20-08cpdn.pdf</a></p>
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<p>Temporary Emergency Shelters</p>	<p>ESG-CV funds may be used to pay for temporary emergency shelters for individuals and families experiencing homelessness in order to prevent, prepare for, and respond to coronavirus.</p> <p>Eligible costs include:</p> <ul style="list-style-type: none"> <li>· Leasing existing real property or temporary structures to be used as temporary emergency shelters</li> <li>· Acquisition of real property (e.g. hotels, ancillary structures, parking lots). The total amount of ESG-CV funds used for acquisition must not exceed \$2.5 million per real property</li> <li>· Renovation (including major rehabilitation and conversion) of real property (e.g., hotels) into temporary emergency shelters. Eligible costs include labor, tools, and other costs for renovation</li> <li>· Shelter operations costs including the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, supplies necessary for the operation of the temporary emergency shelter;</li> <li>· (e) Services, including essential services under 24 CFR 576.102(a)(1), housing search and placement services under 24 CFR 576.105(b)(1), and housing search and counseling services as provided under 24 CFR 578.53(e)(8); except as otherwise stated in this Notice or 24 CFR part 576.408</li> <li>· (f) Other shelter costs HUD pre-approves in writing.</li> </ul>
<p>Training</p>	<p>ESG-CV funds may be used for training on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness and the use of funding shall not be considered administrative costs for purposes of the 10 percent cap.</p>

Hazard Pay	CARES Act, funds may be used to pay hazard pay for recipient or subrecipient-staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness
Handwashing Stations and Portable Bathrooms	ESG-CV funds may be used for installing and maintaining handwashing stations and bathrooms (e.g., porta potties) in outdoor locations for people experiencing unsheltered homelessness.
Landlord Incentives	<p>ESG-CV funds may be used under to add the eligible cost of paying for landlord incentives as reasonable and necessary to obtain housing for individuals and families experiencing homelessness and at risk of homelessness. However, a recipient may not use ESG-CV funds to pay the landlord incentives set forth below in an amount that exceeds three times the rent charged for the unit.</p> <p>Eligible landlord incentive costs include:</p> <ul style="list-style-type: none"> <li>· Signing bonuses equal to up to 2 months of rent</li> <li>· Security deposits equal to up to 3 months of rent</li> <li>· Paying the cost to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit; and,</li> <li>· Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.</li> </ul>

Volunteer Incentives	ESG-CV funds may be used for cost of providing reasonable incentives to volunteers (e.g., cash or gift cards) who have been and are currently helping to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak.
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**Limitations Under ESG-CV Notice:** Since the Substantial Amendments (1 and 2) for DCF ESG-CV were approved by HUD after September 1, 2020, the ESG-CV resources have the following two limitations:

- Medium-term Rental Assistance limited to 3-12 months instead of 3-24 months, and
- Emergency Shelter activities may be provided only until January 31, 2022.

**COVID-19 Pandemic Coordination:** CFCH Lead Agency, HSN has established a Disaster Preparedness Coordinator position to provide member agencies with ongoing and prompt updates on best practices and procedures to prevent, prepare, and respond to COVID-19. HSN will host ongoing coordination calls with providers to disseminate information, exchange knowledge, and improve coordination. A COVID response MOU will be developed to establish region-wide alignment outlining key goals, commitments and shared vision.

**Landlord Incentives:** ESG-CV Funds may be used to incentivize acquisition of new units for supportive housing programs. Incentives may be paid up to \$500 per new unit added to housing system. Terms and conditions as follows:

- Lease needs to be signed by 6/30/2021
- Unit must pass HQS inspection
- Monthly payment must be within the current FMR approved by HSN
- Valid for units in Orange, Osceola, and Seminole Counties
- Lease must list program participant as tenant
- Lease term must be 12 months
- Party receiving incentive payment must provide documentation attesting to agency for property.
- Tenant is ineligible to receive any payment in association with incentive program