



**State of Nevada
Emergency Solutions Grant
&
Rural Nevada Continuum of Care**

Written Standards

Developed for Housing and Services funded through McKinney-Vento Homeless Assistance Programs



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The State of Nevada Housing Division (NHD) and Rural Nevada Continuum of Care (RNCoC) have collaboratively developed the following written standards in accordance with the McKinney-Vento Homeless Assistance Act (The Act). These standards detail the minimum requirements for the State of Nevada’s Emergency Solutions Grants Program (ESG) and Rural Nevada Continuum of Care (CoC) programs and serve as the guiding principles for the provision of services under these programs.

These written standards were created in accordance with the McKinney-Vento Homeless Assistance Act as amended by §896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, enacted into law on May 20, 2009, the Emergency Solutions Grants Program Interim Rule released by the U.S. Department of Housing and Urban Development (HUD) on December 5, 2011, the HEARTH “Homeless” Definition Final Rule released by HUD on December 5, 2011, and the Continuum of Care Program Interim Rule released by HUD on July 31, 2012. The NHD and RNCoC will review these standards no less than annually and amend as needed and as required by HUD.

Subrecipients of NHD ESG and RNCoC funds must, at minimum, comply with these written standards in the provision of assistance funded by these programs. Funding used for match contributions or program income must also follow these written standards. Subrecipients may choose to implement additional standards that exceed these minimum standards but must at least comply with the following guidelines.

1. COORDINATED ASSESSMENT/ENTRY AND REFERRAL SYSTEM

The RNCOC has encouraged counties and towns to develop a localized coordinated intake, assessment and referral system, also referred to as the coordinated entry system. Services targeted to persons experiencing homelessness are delivered by homeless providers throughout Nevada's rural areas. Units of local government and nonprofit agencies participate in the local assessment effort, which ensures homeless persons, including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, are referred to available resources. Many of these agencies participate in the RNCOC, which governs service provisions and standards. Membership and participation in the RNCOC are a requirement of the ESG program.

To address the needs of the homeless in rural Nevada, intake agencies shall utilize the Safety Assessment Triage Tool (SATT) and Community Housing Assessment Tool (CHAT) provided by the RNCOC to prioritize people who are considered high priority for housing and services. The Nevada Rural Housing (NRH) and other housing providers will allocate housing vouchers to persons who score highest in the CHAT until a Housing Choice Voucher or other permanent housing program is made available. Households receiving assistance are case managed by county social services agencies and other homeless providers to ensure long-term stability. Many agencies utilize ESG and other funding sources to pay for case management and other housing stabilization services.

All other homeless and at-risk of homelessness persons who do not score high enough to receive vouchers from NRHA or other providers at the intake agency will be referred to local agencies with programs and services that best meet the needs of the household. Providers must develop and implement screening tools for these programs that will ensure the most vulnerable clients are served first if a screening tool has not been provided by the RNCOC.

All RNCOC recipients and ESG subrecipients are required to participate in the coordinate assessment/entry and referral system. Victim service providers may choose whether or not to use the coordinated assessment/entry and referral system established by the RNCOC but must use a coordinated assessment/entry system that meets the requirements set forth by HUD. * See Exhibit E

2. HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

RNCOC recipients and ESG subrecipients, except for victim service providers, must utilize the statewide Homeless Management Information System (HMIS) database designated by the continuum of care. This database is designated to record and store client-level data, including the characteristic and service needs of the homeless and at-risk of homelessness communities. Utilization of the HMIS database will help provide a consistent and accurate snapshot of populations served through various programs.

Agencies utilizing the HMIS database are expected to comply with all data quality standards. Information must be entered into the database within 24 hours and shall be updated to provide client participation and exit information, income data, and shall have a limited number of fields with "Don't Know", "Refused"

or “Missing”. **Note:** Rapid re-housing client employment data must be entered annually at recertification, however non-cash and other cash income sources should be updated as received.

Emergency shelters may utilize the “auto-exit” feature available through HMIS, which will automatically exit a client that has not had a **service** provided within a select period of time after accessing a shelter bed, however, all data fields will reflect “Data Not Collected” which may impact the overall data quality for the RNCOC and ESG programs. Emergency shelters must make every effort to implement procedures which will ensure clients are formally exited but may utilize this feature if the volume of clients exiting **services** becomes unmanageable. **Note:** *Emergency Shelters should discuss the best option for their circumstance with BitFocus, RNCOC Coordinators, and ESG Coordinators.*

Note: Victim service providers shall actively utilize the HMIS comparable database system designated by the RNCOC and ESG program administrators (BitFocus’ Clarity Human Services) and shall comply with the data quality standards set forth by the RNCOC and ESG programs.

3. PERSONNEL REQUIREMENTS

RNCOC recipients and ESG subrecipients shall make certain that programs targeted to homeless and at-risk of homelessness populations are adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

At a minimum, agencies shall ensure the following standards are in place for programs funded through RNCOC and ESG grants;

- a. Agencies shall select, for its service personnel, only those employees and/or volunteers with appropriate knowledge, or experience, for working with individuals and families experiencing homelessness.
- b. Agencies must include at least one homeless or formerly homeless individual on their Board of Directors or other equivalent policy-making entity.
- c. Agencies must include at least one homeless or formerly homeless individual in the provision of ESG funded services and activities.
- d. Agencies shall have a written plan for, and provide training to, all paid and volunteer staff in both the policies and procedures employed by the program, and in specific skill areas as determined by the program.
- e. All paid and volunteer service personnel shall participate in ongoing internal and/or external training, which will further enhance their knowledge and ability to work with individuals and families experiencing homelessness.
- f. For programs that use HMIS, all users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual provided by the HMIS Lead Agency. Additionally, all users must adhere to privacy and confidentiality terms set forth in the User Agreement.
- g. Agency personnel responsible for supervision of the casework, counseling, and/or case management components have, at a minimum, experience working with individuals and families experiencing homelessness, poverty, disabilities, or other similar challenges.

If the agency is located in a community without access to personnel with at least the required experience, the agency must include strategies to ensure caseworkers have access to training that

will provide housing and case management skills needed for the long-term success of clients served by these programs.

- h. All personnel shall have a written job description that addresses, at minimum, the major tasks to be performed and the qualifications required for the position.
- i. The program shall ensure all paid and volunteer service personnel are familiar with HUD's Fair Housing and Equal Opportunity requirements under 24 CFR 5.105(a); and the new "Equal Access Rule (77 FR 5662).
- j. Supervisors shall ensure quality/coordinated services.

4. COORDINATION WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

The NHD and RNCOC expect providers receiving funds through ESG and RNCOC programs to maximize the use of available Federal, State and local mainstream resources to ensure the long-term stability of program participants. Providers shall actively seek to engage in partnerships with programs and services that are targeted to address homelessness and poverty within their communities.

5. EDUCATIONAL ASSURANCES

The NHD and RNCOC expect providers to collaborate with local education authorities to assist in the identification of individuals and families who become or remain homeless and are informed of the eligibility for services under subtitle B of title VII of the Act. This includes demonstrating that providers establish policies to ensure all children are enrolled in early childhood education programs or in school and connected to appropriate services in the community. Providers shall collaborate with local school districts and early childhood education providers to identify homeless households with children to ensure they understand their eligibility for educational services.

6. PREVENTING INVOLUNTARY FAMILY SEPARATION

Maintaining family unity is important when homeless households with children under the age of 18 enter homeless shelters or housing. The NHD and RNCOC expect providers to ensure homeless households with children under the age of 18 are not denied admission and are not separated. **Note:** The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses ESG funding and provides shelter to families with children under age 18.

7. AFFORDABLE CARE ACT

The NHD and RNCOC expect providers to include enrollment and outreach activities to ensure households have access to healthcare options, including Medicaid.

8. TIMELINESS OF EXPENDITURES

Once activities begin, RNCOC recipients must draw down funds at least once per quarter. ESG subrecipients must draw down funds monthly. Recipients and subrecipients must make every effort to ensure all grant funds are expended by grant close-out. ESG subrecipients who are not on target to expend all funds by the grant deadline may be at risk of funds recapture by the NHD. RNCOC recipients are subject to reallocation of funds by the CoC if funds are not expended in a timely fashion.

ESG subrecipients' grant year begins July 1st of each fiscal year, and expenditures may be reimbursed for expenses that occur on or after July 1st for each grant awarded. Each grant has a term of 24 months.

For RNCOC recipients, the Operating Start Date (OSD) indicates when the term of the grant begins, that is, when the project begins to serve homeless persons, and sets the beginning of the 12-month program year for spending and reporting. For non-construction projects, the OSD is determined as the first day of the month in which the recipient begins incurring eligible operating, supportive service, leasing or rental assistance. New projects with acquisition/rehabilitation/construction costs, the OSD is the earlier of the first day of the month following purchase of the property or completion of construction activities (the date the recipient receives the Certificate of Occupancy) **or** the date the NOFO established as the deadline to begin operating the project. For renewal projects, the OSD and the grant term begin the day after the end of the previous grant term.

9. PERFORMANCE STANDARDS

The NHD and RNCOC expect providers to design programs which will address the needs of the homeless and at-risk of homelessness populations, with the end result of reducing and ending homelessness. The NHD and RNCOC will evaluate the performance* of each provider based on outcomes achieved. Outcomes are outlined and updated in the Performance Standards adopted by the RNCOC Steering Committee. These outcome measures will be used to evaluate program success annually. The NHD and RNCOC will use this and other performance metrics to guide funding decisions for ESG and CoC-funded programs.

* See Attachment C

1. PARTICIPANT ELIGIBILITY:

Minimum standards for evaluating individual and family eligibility for assistance under the ESG program are:

a. **Street Outreach**

People who qualify as “literally homeless” based on Category (1)(i)* of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): *engagement, case management, emergency health and mental health services, transportation*. Program participant files must include documentation that verifies homeless status. * See Exhibit A, Exhibit C, and Exhibit D

b. **Emergency Shelter**

People who qualify as “homeless” based on Category 1,2,3, or 4* of the homeless definition found at 24 CFR 576.2 are eligible for the following: *shelter, case management, childcare, education, employment and life skills services, legal services, health and mental health services, substance abuse services, transportation*. Program participant files must include documentation that verifies homeless status.

* See Exhibit, Exhibit C and Exhibit D

c. **Rapid Re-Housing**

People who qualify as “homeless” based on Category 1 or 4* of the “homeless” definition found at 24 CFR 576.2 and who are moving into a housing unit that meets HUD’s habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.104, 576.105, 576.106) Program participant files must include documentation that verifies homeless status * See Exhibit A, Exhibit C, and Exhibit D

a. *Housing Relocation and Stabilization Services*: moving costs, rent application fees, security deposits, last month’s rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management

b. *Rental assistance*: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.

NOT ALLOWABLE: Mortgage and mortgage arrearage payments

d. **Homelessness Prevention**

People who qualify for “at risk of homelessness” based on Category 2,3,or 4* of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for the following services,

in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106) * See Exhibit A, Exhibit B, Exhibit C, and Exhibit D

- a. Housing Relocation and Stabilization Services: moving costs, rent application fees, security deposits, last month's rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management
- b. Rental Assistance: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.

NOT ALLOWABLE: Mortgage and mortgage arrearage payments.

e. Overall Eligibility

- a. Criminal History:
ESG subrecipients and CoC recipients are allowed flexibility in designing their programs, which means they have the discretion to establish their own policies regarding individuals with criminal histories and sex-offenders. However, providers are encouraged not exclude or deprioritize households on the basis of criminal history, with the exception of site-based restrictions or restrictions imposed by federal, state, or local law or ordinance (e.g., restrictions on serving people who are listed on sex offender registries). ESG subrecipients and CoC recipients must ensure that program policies and procedures related to participants with criminal histories are in line with Housing First practices and do not violate the Fair Housing Act. If an individual or family cannot be served by the ESG subrecipient or CoC recipient, the entity must work with the individual or family to identify another appropriate housing placement or service provider.
- b. Residency Requirement:
Program participants are not required to have lived in the state for any amount of time prior to applying for ESG or CoC assistance.

2. PROGRAM COORDINATION

Minimum standards for program coordination consist of on-going system and program coordination and integration of ESG-funded activities to the maximum extent practicable with the following:

- a. Emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers;
- b. Other homeless assistance providers, including:
 - Shelter Plus Care Program
 - Supportive Housing Program
 - Housing Choice Moderate Rehab program for Single Room Occupancy Program (SRO) for Homeless Individuals
 - HUD-Veterans Affairs Supportive Housing (HUD-VASH)

- Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act)
 - Grants for the Benefit of Homeless Individuals
 - Healthcare for the Homeless
 - Programs for Runaway and Homeless Youth
 - Projects for the Assistance in the Transition from Homelessness
 - Services in Supportive Housing Grants
 - Emergency Food and Shelter Program
 - Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Programs
 - Homeless Veterans Reintegration Program
 - Domiciliary Care for Homeless Veterans Program
 - VA Homeless Providers Grant and Per Diem Program
 - Health Care for Homeless Veterans Program
 - Homeless Veterans Dental Program
 - Supportive Services for Veterans Families Programs, and
 - Veterans Justice Outreach Initiative
 - Cooperative Agreements to Benefit Homeless Individuals (CABHI) Grant
- c. Mainstream service and housing providers**
- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937
 - Housing programs receiving Housing Choice Voucher tenant-based or project-based assistance
 - Supportive Housing for Persons with Disabilities
 - HOME Investment Partnership Program
 - Temporary Assistance for Needy Families
 - Health Center Program
 - State Children’s Health Insurance Program
 - Head Start
 - Mental Health and Substance Abuse Block Grants
 - Services funded under Workforce Investment Act; and
 - Other state programs
- d. Continuum of Care (CoC) Networks**
- RNCoc meetings
 - Community Coalition meetings
 - Local discharge planning initiatives
 - Various other committees, task forces and workgroups

3. INCOME DETERMINATION

Minimum standards for determination of an individual or family’s annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income is defined as:

- a. Annual income includes:**
- All amounts received from all sources by each member of the family who is 18 years of age or older or is the head of household or spouse of the head of household,
 - Unearned income by or on behalf of each dependent who is under 18 years of age,

- Imputed returns on assets valued greater than \$50,000, and
- Amounts which are not specifically excluded as defined under paragraph (b) of 24 CFR 5.609.

ESG Program providers should refer to the ESG Program’s Policies and Procedures Manual and ESG Program Guidelines manual for more details.

4. CONNECTION WITH OTHER RESOURCES

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

- a. Appropriate support services including:
 - Permanent housing
 - Medical health treatment
 - Mental health treatment
 - Counseling
 - Supervision; and
 - Other services needed for independent living.
- b. Other governmental and private assistance available to help with housing stability including:
 - Medicaid
 - Supplemental Nutrition Assistance Program (SNAP)
 - Women, Infants and Children (WIC)
 - Federal-State Unemployment Insurance Program
 - Social Security Disability Insurance (SSDI)
 - Child and Adult Care Food Program; and
 - Other available assistance.

5. TERMINATION OF ASSISTANCE

At all times providers must follow Termination and Grievance Policies set forth by the agency and NHD. At a minimum, standards for termination of assistance are:

- a. **In general:**

If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases.
- b. **Program participants receiving rental assistance or housing relocation or stabilization services:**

When terminating rental assistance or housing relocation and stabilization services, the required formal process shall minimally consist of:

 - Written notice clearly stating the reasons for termination;
 - Review of the decision that gives the participant opportunity to present objections to the decision maker; and
 - Prompt written final notice.
- c. **Ability to provide further assistance:**

Termination will not bar the provider from providing later additional assistance to the same family or individual.

6. LEAD-BASED PAINT

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the lead-based remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R. Refer to ESG Program Policies and Procedures Manual and ESG Program Guidelines for further guidance.

7. SAFETY, SANITATION & PRIVACY

Minimum standards for all shelters and program participant-occupied housing consist of compliance with safety, sanitation and privacy requirements identified in 24 CFR 576.403. Refer to the ESG Program's Policies and Procedures Manual, and ESG Program Guidelines for detail instructions.

- a. **Additional requirements for permanent housing:** Providers shall not use ESG funding to help someone remain or move into housing if the housing does not meet minimum habitability standards. For new move-ins, inspections must occur prior to execution of a landlord/provider agreement and landlord/tenant lease. If a program participant is expected to eventually access subsidized housing, such as the Housing Choice Voucher Program, the provider should make certain the housing unit meets any additional health and safety requirements of that program.

8. CONFLICTS OF INTEREST

Minimum standards for conflicts of interest are:

- a. **Organizational conflict of interest:**
 - ESG assistance will not be contingent on the individual's or family's acceptance, or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent.
 - No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.
- b. **Individual conflicts of interest:**
 - When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 576.404.
- c. **All transactions/activities:**
 - Conflicts prohibited – No persons involved with the ESG program or who is in a position to participate in a decision-making process or gain inside information regarding the program activities, shall obtain a financial interest or benefit from an assisted activity; or have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds (either himself or herself or those with whom he or she has family or business ties) during his or her tenure or for one year following tenure.
 - Persons covered – These conflict-of-interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider's agency.
 - Exceptions – A provider may request an exception to these provisions from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404.

9. HOMELESS PARTICIPATION

Minimum standards for homeless participation are:

- a. To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG-funded facilities, in providing services under ESG and in providing services for occupants of the ESG-funded facilities (24 CFR 576.405)

10. FAITH-BASED ACTIVITIES

Minimum standards for faith-based activities (24 CFR 576.406) are:

- a. Providers receiving ESG funding shall not engage in inherently religious activities as part of the ESG-funded programs or services. Such activities must be offered separately from ESG-funded programs and services and participation must be voluntary.
- b. A religious organization receiving ESG funding retains independence from government and may continue with its mission provided that ESG funds are not used to support inherently religious activities. An ESG-funded organization retains its authority over its internal governance.
- c. An organization receiving ESG funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs.
- d. ESG funding shall not be used for rehabilitation of structures used specifically for religious activities but may be used for rehabilitating structures that are used for ESG-eligible activities.

11. NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE ACTION

Minimum standards shall comply with the requirements for nondiscrimination equal opportunity and affirmative outreach identified in 576.407 (a-b). In addition, providers receiving ESG funding shall follow HUD's *"Equal Access to Housing in HUD Programs, Regardless of Sexual Orientation or Gender Identity"* final rule. Providers shall train program staff and contractors so as to ensure that employees and contractors who interact directly with potential clients and current clients are aware of this rule and take prompt corrective action to address any noncompliance. Refer to CPD Notice 15-02 for further guidance.

12. PROGRAM INCOME

Minimum standards for program income earned during the project period are that program income must be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income must be retained. Costs paid by program income shall count toward meeting the recipient's matching requirements, provided the costs are eligible ESG costs that supplement the recipient's ESG program.

Program income includes:

- a. Any amount of a security or utility deposit returned to the subrecipient
- b. Income from fees for services performed by the subrecipient
- c. Rent and occupancy charges paid directly to the subrecipient by program participants

13. RECOVERED MATERIALS

Minimum standards for the procurement of recovered materials shall comply with the requirements identified in 24 CFR 576.407(f), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The

requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resources recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

14. DISPLACEMENT

Minimum standards for minimizing the displacement of persons (families, individuals, business, nonprofit organizations, and farms) as a result of a project assisted under ESG shall comply with 24 CFR part 576.408 and consist of:

a. Minimizing displacement:

Consistent with ESG goals and objectives, the providers shall minimize displacing people as a result of ESG-funded projects.

b. Temporary relocation not permitted:

No temporary relocation shall be required for an ESG-funded project. When a tenant has to move for an ESG-funded project, the tenant shall be treated as permanently displaced and offered relocation assistance and payments.

c. Relocation assistance for displaced persons:

In general, a displaced person shall be provided relocation assistance and advised of his or her Fair Housing Rights. A *Displaced Person* is defined as any person that moves from a permanent home as a result of ESG-funded acquisition, rehabilitation, or demolition of a project.

d. A person does not qualify as a “displaced persons” if the person:

- Was evicted based on a violation of the lease or occupancy agreement; violation of the law; and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
- Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a “displaced person”.
- The person is ineligible under 49 CFR 24.2(a)(9)(ii); or
- HUD determines that the persons was not displaced as a direct result of the project.

The State or the provider may request that HUD determine whether or not a displacement would be covered by this rule.

e. Real property acquisition requirements:

The acquisition of real property for an ESG funded project is subject to the URA and Federal government wide regulations.

f. Appeals:

A person who disagrees with NHD’s determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance, may file a written appeal. A low-income person who disagrees with NHD’s determination may submit a written request for review of that determination by HUD.

15. RECORDS & RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow NHD and HUD to determine whether ESG requirements are being met, and if they comply with 24 CFR 576.500.

Program participant records shall include written:

- a. Determination and verification/certification that the program participant met the criteria for being Homeless or At-Risk of Homelessness, and that an effort was made to obtain written third-party verifications, when possible and applicable. See Exhibit D;
- b. Determination and verification/certification that the program participant was eligible or ineligible for the service(s) and/or financial assistance;
- c. Determination and verification/certification that the program participant lacked sufficient resources and support networks to provide the assistance;
- d. Determination and verification/certification that the program participant met income requirements and that an effort was made to obtain written third-party verifications, when possible and applicable;
- e. Identification of the specific services and financial assistance amounts that were provided to the program participant;
- f. When applicable, verification that the services were terminated in compliance with 24 CFR 576.402;
- g. A copy of the CoC-approved coordinated assessment/entry of the program participant;
- h. Copies of leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with the fair market rent, rent reasonableness, and utility allowance requirements;
- i. Determination and verification that at a minimum, the housing unit met HUD's habitability and lead-based paint standards;
- j. Copy of individualized housing stability plan;
- k. Notes verifying case management services were provided at least monthly;
- l. Notes verifying program participants' eligibility was re-evaluated at least every 3 months for homeless prevention services or at least annually for rapid re-housing services;
- m. Notes verifying program participant was assisted to obtain mainstream and other resources.

Program policies and procedures shall indicate:

- a. Services are coordinated with the Continuum of Care, other homeless assistance/prevention programs and mainstream service and assistance programs;
- b. Compliance with HUD's ESG (24 CFR 576) requirements for:
 - Shelter and housing standards
 - Conflicts of interest
 - Homeless participation
 - Equal participation of faith-based organizations
 - Nondiscrimination equal opportunity, and equal access
 - Lobbying disclosure requirements
 - Debarred, suspended, or ineligible contractors and participants
 - Drug-free workplace
 - Audits

- Housing counseling
 - Affirmatively furthering fair housing
 - Affirmative outreach
 - Uniform administration (2 CFR part 200)
 - Environmental reviews
 - Davis-Bacon Act
 - Procurement of recovered materials
 - Displacement, relocation, and acquisition
 - Violence Against Women Act (VAWA)
- c. Program participant records are kept secure and confidential
- d. Participation in HMIS or comparable database selected by the Continuum of Care or NHD, including timeliness of data entry and data quality expectations.

Financial records shall include:

- a. Supporting documentation for all costs charged to ESG grant, including evidence that rent checks are paid to the property owner
- b. Documentation showing ESG funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
- c. Documentation of appropriate and sufficient match including evidence of all match sources obtained, and documentation of expenditures of cash match for eligible grant expenses
- d. Evidence that expenditures did not occur outside of the grant term
- e. Documentation regarding salary expenditures for grant-related activities
- f. Documentation of the receipt and use of program income
- g. Copies of procurement contracts

STREET OUTREACH, EMERGENCY SHELTER, & TRANSITIONAL FACILITIES MINIMUM STANDARDS

1. STREET OUTREACH MINIMUM STANDARDS

a. Targeting/Engagement

Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those 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. Assessment/Service Provision/Referral/Prioritization

- Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered the following Street Outreach services, as needed and appropriate: *engagement, case management, emergency health and mental health, and transportation services*
- When appropriate based on the individual's needs and wishes, the referral to permanent supportive housing or rapid re-housing can quickly assist the individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to an emergency shelter.

2. EMERGENCY SHELTER MINIMUM STANDARDS

An emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless, and which does not require occupants to sign leases or occupancy agreements. The following minimum standards shall be required of any emergency shelter funded through the Emergency Solutions Grant program:

a. Admission:

Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of "homeless" as specified in 24 CFR 576.2 (1, 2, 3, & 4) and agency's eligibility criteria.

b. Assessment:

Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered emergency shelter services, as needed, available, and appropriate.

c. Prioritization/Diversion/Referral:

When appropriate based on the individual's needs and wishes, the provision of or referral to Homeless Prevention or Rapid Re-Housing services, or other available housing programs offered through the Continuum of Care that can quickly assist individuals to maintain or obtain safe, permanent housing, shall be prioritized over the provision of Emergency Shelter services.

d. Reassessment:

Program participants will be reassessed as case management progresses, based on the individual service provider's policies, but no less than once per month.

e. Discharge/Length of Stay:

Subrecipients shall make every effort to ensure program participants are discharged from Emergency Shelter services **only** when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

f. Safety and Shelter Safeguards for Special Populations:

Safety and Shelter Safeguards shall be determined by the individual Special Population service provider's policies and clearly communicated to program participants.

3. TRANSITIONAL HOUSING FOR THE HOMELESS

Minimum standards for transitional housing programs funded through ESG shall be the same as transitional housing programs funded under the RNCoC. Refer to that section for minimum standard requirements. ***Only people who qualify as "homeless" based on Category 1 or 4* of the "homeless" definition found at 24 CFR 576.2 are eligible for transitional housing assistance.*** * See Exhibit A and Exhibit D

1. ELIGIBILITY/PRIORITIZATION

Minimum standards for determining and prioritizing which eligible families and individuals shall receive homelessness prevention assistance and which eligible families and individuals shall receive rapid re-housing assistance are:

a. Rapid Re-housing (RRH):

To be eligible for RRH Housing Relocation and Stabilization Services and short-term and medium-term rental assistance, participants must:

- Meet the federal criteria under paragraph (1) of the “homeless” definition in 24 CFR 576.2; **OR**
- Meet the criteria under paragraph (4) of the “homeless” definition in 24 CFR 576.2 *and* live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.

b. Homelessness Prevention (HP):

To be eligible for HP Housing Relocation and Stabilization Services and short-term and medium-term rental assistance, participants **must require** HP services to prevent moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2, have an annual income **below** 30% of the median income for the area, and:

- Meet the federal criteria under the “at risk of homelessness” definition in 24 CFR 576.2; **OR**
- Meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR 576.2

2. PARTICIPANT CONTRIBUTION

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or rapid re-housing assistance are:

- a. Participant’s income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant’s income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant’s file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.
- b. Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant must pay shall be determined by the individual service provider’s policies and clearly communicated to program participants.

3. RENTAL ASSISTANCE DURATION AND ADJUSTMENT

Minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time are:

- a. Participants received approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant’s file for

each month of financial assistance received. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.

- b. Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.

4. SERVICE TYPE, AMOUNT & DURATION

Minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services provided to a program participant, including maximum amount of assistance, maximum number of months the program participant may receive assistance, or the maximum number of times the program participant may receive assistance, are:

a. Financial Assistance

- Use with other subsidies: Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
- Rental application fees: Payments shall only be made for fees charged by the owner to all applicants.
- Security deposits: Payments shall not exceed two (2) month's rent.
- Last month's rent: Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total rental assistance.
- Utility deposits: Payments shall only be made for gas, electric, water and sewage deposits.
- Utility payments:
 - Payments shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service;
 - A partial payment counts as 1 month;
 - Payment shall only be made if the utility account is in the name of the participant or a member of the same household;
 - Payment shall only be made for gas, electric, water and sewage costs;
 - Participants shall not receive more than 24 months of utility assistance within any 3-year period.
- Moving costs: Payments shall only be made for up to 3 months of moving costs including moving truck rental, moving company expenses, and temporary storage fees accrued after the date the participant begins receiving housing relocation and stabilization services and prior to the date that the participant moves into permanent housing. Payment shall not be made for storage fees in arrears.

b. Housing Relocation and Stabilization Services

- Housing search and placement services: Payment shall only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:
 - Assessment of housing barriers, needs and preferences
 - Development of an action plan for locating housing
 - Housing search
 - Outreach to and negotiation with owners
 - Assistance with submitting rental applications and understanding leases
 - Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness
 - Assistance with obtaining utilities and making moving arrangements
 - Tenant counseling

Payment for housing search and placement services shall not exceed 24 months during any 3-year period.

- Housing stability case management: Payment shall only be made for assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:
 - Using coordinated assessment/entry system
 - Conducting the initial evaluation, including verifying and documenting participant eligibility
 - Counseling
 - Developing, securing and coordinating services and obtaining Federal, State and local benefits
 - Monitoring and evaluating participant progress
 - Providing information and referral to other providers
 - Developing an individualized housing and service plan
 - Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days.

Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

- Mediation: Payment shall only be made for the cost of mediation between the participant and the owner or person with whom the participant is living, if it is necessary to prevent the participant from losing the permanent housing where he/she resides. Payment for mediation services shall not exceed 24 months during any 3-year period.
- Legal services: Payment shall only be made for the cost of legal services, if they are necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the participant losing the permanent housing

where he/she resides. Payment for legal services shall not exceed 24 months during any 3-year period.

- *Credit repair*: Payment shall only be made for the cost of assisting the participant in obtaining skills related to household budgeting, managing money, accessing a free personal credit report and resolving personal credit problems. Payment will not be made for a debt or modification of a debt. Payment for credit repair services shall not exceed 24 months during any 3-year period.

c. Rental Assistance

- Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based housing.
- Payment for short-term rental assistance shall not exceed 3 months
- Payment for medium-term rental assistance shall be for more than 3 months but shall not exceed 24 months.
- Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees.
- Except for a one-time payment of rental arrears on the participant's portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance or to a participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
- Payment shall not exceed the Fair Market Rent established by HUD (24 CFR 888) and shall comply with HUD's standards of rent reasonableness (24 CFR 982.507).
- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet or late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
- Payment for rent shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the provider with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period, and late payment penalty requirement as the participant's lease.
- Payment of any late payment penalties incurred by the provider shall not be claimed for reimbursement by ESG.
- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears.
- Payment shall only be made once the participant has been deemed eligible for assistance.
- Payments shall not be made until required re-certifications have been completed and all documentation of continued eligibility is received. For HP clients, the 4th, 7th, 10th, etc. month of payment cannot be processed until re-certification of client eligibility is confirmed. For RRH clients, the 13th month of payment cannot be processed until re-certification of client eligibility is confirmed.

d. Tenant-Based Rental Assistance

The rental assistance agreement with the unit owner shall be terminated without further payment if:

- The participant moves out of the unit
- The lease terminates and is not renewed
- The participant becomes ineligible to receive ESG rental assistance

e. Project-Based Rental Assistance

Payment shall only be made under the following conditions:

- The lease has an initial term of one year
- The rental assistance agreement covers one or more permanent housing units in the same building
- Each unit covered by the agreement is only occupied by participants
- Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month.

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

5. RE-EVALUATIONS

Minimum standards for completing eligibility re-evaluations of individuals and families are:

a. Timing:

- Homelessness Prevention: Participants shall be re-evaluated not less than once every three months. The next month's rental payment shall not be paid until completion of the re-certification process.
- Rapid Re-housing: Participants shall be re-evaluated not less than once annually. The next month's rental payment shall not be paid until completion of the re-certification process.

b. Eligibility

- The participant shall have an annual income that is at or below 30 percent of median family income for the area, as determined by HUD; and
- The participant shall continue to lack sufficient resources and support networks necessary to retain housing without ESG assistance.

1. OVERVIEW

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) enacted into law on May 20, 2009, consolidated three of the separate homeless assistance programs administered by the U.S. Department of Housing and Urban Development (HUD) under the McKinney-Vento Homeless Assistance Act into a single grant program. The HEARTH Act also codified into law the Continuum of Care (CoC) planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs. The interim regulation was published in the Federal Register on July 31, 2012, and became effective August 30, 2013.

The purpose of the CoC program is to promote communitywide commitment to the goal of ending homelessness; providing funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

The CoC program includes transitional housing, permanent supportive housing for disabled persons, permanent housing, supportive services, and Homeless Management Information Systems. A CoC is a geographically based group of representatives that carries out the planning responsibilities of the CoC program, as set for the in 24 CFR part 578. These representatives come from organizations that provide services to the homeless or represent the interests of the homeless or formerly homeless. The three major duties of a CoC are to (1) operate the CoC; (2) designate an HMIS for the CoC; and (3) develop a plan for the CoC. In rural Nevada, the Rural Nevada Continuum of Care (RNCOC) is the homeless planning group that oversees the CoC process for 14 rural counties and Carson City.

24 CFR 576.7(9) requires the RNCOC, in consultation with the Emergency Solutions Grants program funds within the geographic area, to establish and consistently follow written standards for providing CoC assistance. ***Each RNCOC recipient must also establish and follow local written standards for providing assistance, which at a minimum must include the RNCOC's Standards defined below.***

2. PROGRAM COMPONENTS AND ELIGIBLE ACTIVITIES

CoC funds may be used for projects under five program components: Permanent housing (PH), Permanent Supportive Housing for Disabled Persons (PSH), Transitional Housing (TH), Supportive services Only (SSO), and HMIS. Eligible costs include: CoC planning activities, Unified Funding Agency costs, acquisition, rehabilitation, new construction, leasing, rental assistance, supportive services, operating costs, HMIS, project administrative costs, relocation costs, and indirect costs. Projects funded in the RNCOC consist of permanent and transitional housing programs. The following Standards will summarize the RNCOC's minimum requirements for providing housing and services to PH, PSH, and TH clients.

The RNCoc developed the following Transitional Housing (TH) minimum standards to ensure:

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

RNCoc recipients must include the following minimal standards when developing and implementing local programs.

1. CLIENT INTAKE PROCESS

Minimum standards for evaluating individual and family eligibility for assistance under a Transitional Housing program **not to exceed 24 months** shall include the following: (*Note: The program shall ensure active client participation and informed consent*)

Eligibility Criteria

- a. Description of how program participants will be screened via the community’s Coordinated Assessment/Entry and Referral System, and/or a description of how referrals will be accepted from the intake agency which will ensure that, and placement priority will be determined through the use of the Vulnerability Tool*. *See Exhibit E clients who are most vulnerable will be given priority access to available programs.
- b. All adult program participants must meet the following program eligibility requirements:
 - 18 years of age or older
 - Qualify as “homeless” based on paragraphs (1 or 4) * of the homeless definition
*See Exhibit A
 - If applicable, how adult household members are able to participate in developing and carrying out an appropriate participation plan.
- c. Additional program eligibility requirements. RNCoc prefers that only the following additional requirements be included in the standards for evaluating a household’s eligibility for assistance; however, acknowledges that existing grantees may have other criteria. Written standards must include all eligibility requirements and the reasoning behind the decision to include them if other than the following:
 - Chronically homeless
 - Residency requirements
 - Other program-specific requirements (i.e. limiting program entry to a specific subpopulation of individuals or families experiencing homelessness)
- d. A description of all reasons that programs may disqualify an individual or family from program entry. (The RNCoc encourages providers to disqualify only for the following reasons):
 - Household make-up, provided it does not violate HUD’s Fair Housing, Equal Opportunity, and Equal Access to Housing in HUD Program requirements (Singles Only programs can disqualify households with children, Families Only programs can disqualify single households, etc.)

- Criminal record that includes violent crimes within the last three years
 - Status as a lifetime registered sex offender.
- e. RNCoc encourages providers to design programs so that agencies don't disqualify an individual or family from program entry for lack of income or employment status.
 - f. Programs cannot disqualify an individual or family because of evictions or poor rental history.
 - g. The program explains the services that are available and the requirements for participation and secures a commitment from each adult household member to participate in program services prior to admitting the individual or family into the program.
 - h. The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants have copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.

2. HOUSING CRITERIA

Minimum standards for accessing housing are:

- a. The program shall provide safe, affordable housing that meets participant's needs in accordance with client intake practices and within HUD guidelines for transitional housing programs.
- b. In providing or arranging for housing, the program shall consider the needs of the individual or family experiencing homelessness.
- c. The program provides assistance in accessing suitable housing.
- d. The program may provide assistance with moving costs.
- e. The program ensures that there are executed occupancy agreements or leases (or subleases) with all program participants residing in housing.
 - The lease agreement with the participant is for a term of at least one month and ends in 24 months and cannot be extended
- f. The program shall not charge minimum rent.
- g. If the program imposes occupancy charges, the charges may not exceed the highest of:
 - 30% of the household's monthly adjusted gross income; or
 - 10% of the household's monthly income; or
 - If the household receives payment for welfare assistance from a public agency and a part of the payment is specifically designated by the agency to meet the household's housing costs, the occupancy charge cannot be higher than the portion that has been designated for housing costs.

When determining rental costs, agencies cannot round up to the nearest dollar.

3. CASE MANAGEMENT SERVICES

Minimum standards for case management shall include:

- a. **Criteria (Required)**
 - How individual case management is provided to program participants on a regular and consistent basis as determined by the individual's case plan. Case management shall include the following:
 - Assessing, planning, coordinating, implementing and evaluating the overall service delivered to the participant.

- Helping participants learn to live in housing, maintain their housing in a safe manner, and work with the landlord.
 - Helping participants create support systems and participate in community as they desire.
 - Individualized budgeting and money management services are provided to program participants as needed.
- b. Criteria (other eligible services to encourage self-sufficiency)** If applicable, written standards shall include descriptions of how the Provider will assist clients to achieve the following criteria to ensure RNCoC performance measures are met:
- Job preparation and attainment, such as career counseling, job preparation training, dress and grooming, job placement, and job retention. *(Required RNCoC performance measure)*
 - Assistance in accessing mainstream benefits, including food stamps, childcare assistance, and health insurance. *(Required RNCoC performance measure)*
 - Educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education. *(Required RNCoC performance measure)*
 - Basic life skills information, including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security cards, birth certificate, etc.)
 - Assistance with food, clothing and/or transportation.
 - Interpersonal skill building, such as developing positive relationships with others, parenting skills, effective communication, decision-making, conflict resolution, and stress management.
 - The program may require program participants to take part in supportive services provided through the program as a condition of continued participation, as long as the services are not disability-related (e.g. mental health, outpatient health services)
 - The program can only require disability-related services if the participant's housing stability is in jeopardy.

Only projects whose primary purpose is to provide substance abuse treatment services may require program participants to take part in substance abuse treatment services as a condition of continued program participation.

4. SERVICE COORDINATION

Minimum standards for service coordination are:

- a.** The program shall coordinate with community agencies and individuals for the provision of those services needed and requested by the individual or family, but that are not directly provided by the programs.
 - Arrangements shall be made as appropriate with community agencies and individuals for the provision of medical services, mental health services, legal services, and other assistance requested by the participant, which are not provided directly by the program.

5. TERMINATION OF ASSISTANCE

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

At a minimum, standards for termination of assistance are:

- a.** If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected.
- b.** The program may terminate services when the following occurs:
 - A participant engages in violent or aggressive behavior toward others, including program staff.
 - A participant uses illegal drugs in their unit.
 - A participant engages in criminal activity in their unit.
- c.** In cases when a participant is terminated from services for other than the above stated reasons, the burden is on the Program to provide evidence that it considered extenuating circumstances and made significant attempts to help the participant continue in the program before deciding to terminate assistance.
- d.** The program follows a written termination process and has a process for appeals/grievances. This information is provided to participants at the beginning of the program, and if/when termination of services occurs.

6. FOLLOW UP SERVICES

Minimum standards for continuity of services to all participants following exit from the program shall be as follows:

- a.** The program shall include exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
- b.** The program shall attempt to follow up with phone or written contact at least once every 30 days for the first three months after the client exits the program, to determine if there is any need for further services, to offer assistance in obtaining those services, and to evaluate the services that were provided.
- c.** Supportive services may be provided to participants after their exit from the program.

7. CLIENT FILES/RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow RNCoc and HUD to determine whether program requirements are being met and comply with HUD regulations. Documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

- a.** The file maintained on each participant should, at a minimum, include information required by HUD, homelessness eligibility in the preferred order as required by HUD (third-party, intake observation, self-certification), participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community

- agencies and individuals, discharge paperwork, HMIS service transactions, and any follow-up and evaluation data that is compiled.
- b.** Client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual and implemented in the RNCoC Performance Standards. At a minimum, programs must record the date the client enters and exits the program and update the client's information as changes occur.
 - c.** The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate, except to project staff and other agencies as required by law. Participants must give informed consent to release any personal identifying information (PII) data to be utilized for research, teaching and public interpretation.
 - d.** All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by scanning, photocopying, or similar methods may be substituted for the original records.
 - e.** Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants. Records pertaining to other funding sources must adhere to those record retention requirements.

8. EVALUATION AND PLANNING

Minimum standards shall include program planning and evaluation procedures as follows:

- a.** The program shall have written goals and objectives for its housing and services that are consistent with RNCoC goals and objectives, and includes any commitments made to participants and the local community.
- b.** The program shall include a review of the case management, housing, and follow-up needs of participants served by the program and the existing services that are available to meet these needs, on at least an annual basis.
- c.** The program shall include a process where the agency will review and revise, as appropriate, goals, objectives and activities based upon the data generated through the review of participant's needs, existing services, and the follow-up evaluations on at least an annual basis.
- d.** The program shall include a process for conducting on-going evaluations of its services to participants.
- e.** The program shall exhibit due regard for the participant's privacy in conducting and reporting its evaluation.
- f.** The program's planning and/or evaluation process shall be open to paid and volunteer staff, program participants, the agency's Board of Directors, if applicable, and members of the RNCoC Steering Committee.

Research has shown that permanent supportive housing is the most intensive and effective solution for people experiencing homelessness. It is not a one-size-fits-all approach and should only be offered to those households that truly need that level of support. Unless there is a systematic way to prioritize households with the highest needs, the most vulnerable homeless, including the chronically homeless, are often not the population who receives this type of assistance.

HUD published the following Prioritization Notice in July 2014 which established a **suggested** order of priority for households served in permanent supportive housing programs and provides uniform recordkeeping requirements to document the chronically homeless status of program participants. The intent of the Notice is to move CoC's and recipients of CoC Program funding for PSH in a direction where chronically homeless persons, including chronically homeless unaccompanied youth or unaccompanied youth with the highest needs, are prioritized for assistance **above** other eligible households. The RNCOC encourages all PSH grantees to incorporate the process described in the Notice when developing local written standards. The Notice and FAQ can be found at the following links:

[NOTICE CPD-14-012: PRIORITIZING PERSONS EXPERIENCING CHRONIC HOMELESSNESS IN PERMANENT SUPPORTIVE HOUSING AND RECORDKEEPING REQUIREMENTS FOR DOCUMENTING CHRONIC HOMELESS STATUS](#)

[Frequently Asked Questions on the Notice CPD-14-012 \(hudexchange.info\)](#)

The RNCOC has developed the following Permanent (Supportive) Housing (PH/PSH) minimum standards to ensure:

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

Although the RNCOC strongly encourages PSH providers to adopt recommendations provided in the Notice above, at a minimum the following written standards must be included when developing and implementing local programs.

1. CLIENT INTAKE PROCESS

Minimum standards for evaluating individual and family eligibility for assistance under a Permanent Housing/Permanent Supportive Housing Program (long term housing for 24+ months) shall include the following: (*Note: The program shall ensure active client participation and informed consent*)

Eligibility Criteria

- a. Description of how program participants will be screened via the community's Coordinated Assessment/Entry and Referral System, and/or a description of how referrals will be accepted from the intake agency which will ensure that clients who are most vulnerable will be given priority access to available programs.
- b. All adult program participants must meet the following program eligibility requirements:
 - 18 years of age or older
 - Qualify as "literally homeless" based on paragraphs (1 or 4) * of the homeless definition

*See Exhibit A

- At least one adult in the household has a disabling condition
 - Adult household members are able to participate in developing and carrying out an appropriate participation plan and maintain accountability of said plan
- c. Additional program eligibility requirements. RNCOC prefers that only the following additional requirements be included in the standards for evaluating a household's eligibility for assistance; however, acknowledges that existing grantees may have other criteria. Written standards must include all eligibility requirements and the reasoning behind the decision to include them if other than the following:
- Chronically homeless
 - Residency requirements
 - Other program-specific requirements (i.e. limiting program entry to a specific subpopulation of individuals or families experiencing homelessness)
- d. A description of all reasons that programs may disqualify an individual or family from program entry. (The RNCOC encourages providers to disqualify only for the following reasons):
- Household make-up, provided it does not violate HUD's Fair Housing, Equal Opportunity, and Equal Access to Housing in HUD Program requirements (Singles Only programs can disqualify households with children, Families Only programs can disqualify single households, etc.t)
 - Criminal record that includes violent crimes within the last three years
 - Status as a lifetime registered sex offender.
- e. RNCOC encourages providers to design programs so that agencies don't disqualify an individual or family from program entry for lack of income or employment status.
- f. Programs cannot disqualify an individual or family because of evictions or poor rental history.
- g. The program explains the services that are available and the requirements for participation and secures a commitment from each adult household member to participate in program services prior to admitting the individual or family into the program.
- h. The program maintains a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants have copies of all Releases of Information that they have signed and have the right to revoke any Release of Information without penalty.

2. HOUSING CRITERIA

Minimum standards for accessing housing are:

- a. The program shall provide safe, affordable housing that meets participant's needs in accordance with client intake practices and within HUD guidelines for permanent (supportive) housing programs.
- b. In providing or arranging for housing, the program shall consider the needs of the individual or family experiencing homelessness.
- c. The program provides assistance in accessing suitable housing and meets housing standards set forth in 24 CFR 576.75.
- d. The program may provide assistance with moving costs.

- e. The program signs occupancy agreements or leases (or subleases) with all program participants residing in housing.
- f. The program ensures that there are executed occupancy agreements or leases (or subleases) with all program participants residing in housing.
 - The lease agreement with the participant is for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month.
- g. The program shall not charge minimum rent.
- h. If the program imposes occupancy charges, the charges may not exceed the highest of:
 - 30% of the household's monthly adjusted gross income;
 - 10% of the household's monthly income; or
 - If the household is receiving payment for welfare assistance from a public agency and a part of the payment is specifically designated by the agency to meet the household's housing costs, the portion paid by the program participant cannot exceed the amount that has been designated for housing costs.
 - When determining rental costs, agencies cannot round up to the nearest dollar.

3. CASE MANAGEMENT SERVICES

Minimum standards for case management shall include:

a. *Criteria*

- Individual case management plans which are provided to program participants on a regular and consistent basis as determined by the individual's case plan. Case management plans shall include the following:
 - Assessing, planning, coordinating, implementing and evaluating the overall service delivered to the participant.
 - Helping participants learn to live in housing, maintain their housing in a safe manner, and work with the landlord.
 - Helping participants create support systems and participate in community as they desire.
- Individualized budgeting and money management services, provided to program participants as needed.
- Job preparation and attainment, such as career counseling, job preparation training, dress and grooming, job placement, and job maintained. (Required RNCOC performance measure)
- Assistance in accessing mainstream benefits, including food stamps, childcare assistance, and health insurance. (Required RNCOC performance measure)
- Educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education. (Required RNCOC performance measure)
- Basic life skills information, including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security cards, birth certificate, etc.).
- Assistance with food, clothing and/or transportation.

- Interpersonal skill building, such as developing positive relationships with others, parenting skills, effective communication, decision-making, conflict resolution, and stress management.
- The program may require program participants to take part in supportive services provided through the program as a condition of continued participation, as long as the services are not disability-related (e.g. mental health, outpatient health services)
- The program can only require disability-related services if the participant's housing stability is in jeopardy.

Only projects whose primary purpose is to provide substance abuse treatment services may require program participants to take part in substance abuse treatment services as a condition of continued program participation.

4. SERVICE COORDINATION

Minimum standards for service coordination are:

- a. The program shall coordinate with community agencies and individuals for the provision of those services needed and requested by the individual or family, but that are not directly provided by the programs.
 - Arrangements shall be made as appropriate with community agencies and individuals for the provision of medical services, mental health services, legal services, and other assistance requested by the participant, which are not provided directly by the program.

5. TERMINATION OF ASSISTANCE

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

At a minimum, standards for termination of assistance are:

- a. If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected.
- b. The program may terminate services when the following occurs:
 - A participant engages in violent or aggressive behavior toward others, including program staff.
 - A participant uses illegal drugs in their unit.
 - A participant engages in criminal activity in their unit.
- c. In cases when a participant is terminated from services for other than the above stated reasons, the burden is on the Program to provide evidence that it considered extenuating circumstances and made significant attempts to help the participant continue in the program before deciding to terminate assistance.
- d. The program follows a written termination process and has a process for appeals/grievances. This information is provided to participants at the beginning of the program, and if/when termination of services occurs.

6. FOLLOW UP SERVICES

Minimum standards for continuity of services to all participants following exit from the program shall be as follows:

- a. The program shall include exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
- b. The program shall attempt to follow up with phone or written contact at least once every 30 days for the first three months after the client exits the program, to determine if there is any need for further services, to offer assistance in obtaining those services, and to evaluate the services that were provided.
- c. Supportive services may be provided to participants after their exit from the program.

7. CLIENT FILES/RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow RNCoc and HUD to determine whether program requirements are being met and comply with HUD regulations. Documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

- a. The file maintained on each participant should, at a minimum, include information required by HUD, homelessness eligibility in the preferred order as required by HUD (third-party, intake observation, self-certification), participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, discharge paperwork, HMIS service transactions, and any follow-up and evaluation data that is compiled.
- b. Client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual and implemented in the RNCoc Performance Standards. At a minimum, programs must record the date the client enters and exits the program and update the client's information as changes occur.
- c. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate, except to project staff and other agencies as required by law. Participants must give informed consent to release any personal identifying information (PII) data to be utilized for research, teaching and public interpretation.
- d. All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.
- e. Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants. Records pertaining to other funding sources must adhere to those record retention requirements.

8. EVALUATION AND PLANNING

Minimum standards shall include program planning and evaluation procedures as follows:

- a. The program shall have written goals and objectives for its housing and services that are consistent with RNCOC goals and objectives, and includes any commitments made to participants and the local community.
- b. The program shall include a review of the case management, housing, and follow-up needs of participants served by the program and the existing services that are available to meet these needs, on at least an annual basis.
- c. The program shall include a process where the agency will review and revise, as appropriate, goals, objectives and activities based upon the data generated through the review of participant's needs, existing services, and the follow-up evaluations on at least an annual basis.
- d. The program shall include a process for conducting on-going evaluations of its services to participants.
- e. The program shall exhibit due regard for the participant's privacy in conducting and reporting its evaluation.
- f. The program's planning process shall be open to paid and volunteer staff, program participants, the agency's Board of Directors, if applicable, and members of the RNCOC Steering Committee.

9. HOUSING FIRST APPROACH

The most successful model for housing people who experience chronic homelessness is permanent supportive housing using a "Housing First" approach, which is a client-driven strategy that provides immediate access to housing without requiring participation in psychiatric treatment, treatment for substance use disorders, or other service participation requirements. After settling into housing, clients are offered a wide range of supportive services that focus primarily on helping them maintain their housing. The RNCOC strongly encourages recipients of PH/PSH funding to implement a Housing First approach. Grantees that implement a Housing First approach must ensure written standards include the following core components:

- a. Few to no programmatic prerequisites to permanent housing entry
 - People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of substance use treatment, or agreeing to comply with a treatment regimen upon entry into the program. People are also not required to first enter a transitional housing program in order to enter permanent housing.
- b. Low barrier admission policies
 - Permanent supportive housing's admissions policies are designed to "screen-in" rather than "screen-out" applicants with the greatest barriers to housing, such as having no or very low income, poor rental history and past evictions, or criminal histories. Housing programs may have tenant selection policies that prioritize people who have been homeless the longest or who have the highest service needs as evidenced by vulnerability assessment or the high utilization of crisis services.
- c. Rapid and streamlined entry into housing
 - Many people experiencing chronic homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. To ameliorate this, Housing First permanent supportive housing models make efforts to help people experiencing

homelessness move into permanent housing as quickly as possible, streamlining application and approval processes, and reducing wait times.

- d. Supportive services that are voluntary, but can and should be used to persistently engage tenants to ensure housing stability
 - Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of substance use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.
- e. Tenants have full rights, responsibilities, and legal protections
 - The goal of the Housing First approach is to help people experiencing homelessness achieve long-term housing stability in permanent housing. Permanent housing is defined as housing where tenants have leases that confer the full rights, responsibilities, and legal protections under Federal, state and local housing laws. Tenants are educated about their lease terms, given access to legal assistance, and encouraged to exercise their full legal rights and responsibilities. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants' apartments without tenant's knowledge and permission except under legally defined emergency circumstances, or as required applicable housing programs (e.g. HOME and Low-Income Housing Tax Credit programs requires 24-hour notice to conduct inspections for health and safety). Many Housing First permanent supportive housing programs also have a tenant association or council to review program policies and provide feedback, and formal processes for tenants to submit suggestion or grievances.
- f. Practices and policies to prevention lease violations and evictions are in place
 - Housing First supportive housing programs should incorporate practices and policies that prevent lease violations and evictions among tenants. For instance, program policies consistent with a Housing First approach do not consider substance use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with illegal activity (e.g. selling illegal substances.) Housing First models may also have policies that give tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant's income. For example, rather than moving towards eviction proceedings due to missed rent payments, programs may allow tenants to enter into payment installment plans for rent arrearages or offer money management assistance to tenants.
- g. Is applicable in a variety of housing models
 - The Housing First approach can be implemented in different types of permanent supportive housing settings, including scattered-site models in private market apartments, where rental assistance is provided, and tenants have access mobile and site-based supportive services; single-site models in which permanent supportive housing buildings are newly constructed or rehabilitated and tenants have access to voluntary on-site services; and set-asides, where supportive services are offered to participants in designated units within affordable housing developments.

At-risk of Homelessness – An individual or family who has income below 30% of area median family income for the area, as defined by HUD, and who does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place described in the “homeless” definition (See Exhibit A and Exhibit B), and meets one if the following definitions defined under 24 CFR 578.3 (CoC program) or 24 CFR 576.2 (ESG program). May also include a child or youth who qualifies as homeless under other Federal programs.

Chronically Homeless – A person is chronically homeless if they have been homeless for at least one year continuously or has experienced four episodes over the last three years. For this definition, the persons must have been homeless in a place not meant for human habitation, in an emergency shelter, or in a safe haven. In addition, persons must be diagnosed with one or more of the following conditions: Substance abuse disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

CoC/Continuum of Care – A 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 services providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless or formerly homeless persons. These entities are organized to plan for and provide 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.

Developmental Disability – Defined in Section 102 of the Developmental Disability Assistance and Bill of Rights Act of 2000, and means a severe, chronic disability that is attributable to a mental or physical impairment or combination, **and** is manifested before age 22, **and** is likely to continue indefinitely. It must result in substantial limitations in 3 or more major life activities (self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, or economic self-sufficiency) **and** reflects need for special services or individualized support, or other form of assistance this is lifelong or extended duration.

Disabling Condition – A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury, which is expected to be of long-continued and indefinite duration, substantially impedes the person’s ability to live independently, and is of such a nature that such ability could be improved with more suitable housing conditions; a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 200; or Acquired immunodeficiency Syndrome (AIDS) or any conditions arising from the etiologic agent for Acquired Immunodeficiency Syndrome, including infection with the Human Immunodeficiency Virus (HIV).

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.

ESG – Emergency Solutions Grants Program (24 CFR part 576)

Fair Market Rent – Means the rents published in the Federal Register annually by HUD.

Families – Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the followings: (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or (2) A group of persons residing together, and such group includes, but is not limited to (a) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family); (b) An elderly family; (c) A near-elderly family; (d) A disabled family; (e) A displaced family; and (f) The remaining member of a tenant family.

HMIS – Homeless Management Information System means the information system designated by the Continuum of Care to comply with the HMIS requirements prescribed by HUD.

HMIS Lead Agency – The entity designated by the Continuum of Care to operate the HMIS on its behalf. *Currently Clark County for the State of Nevada*

Homeless – There are 4 categories within the definition of homelessness, as defined under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act); the most common definition being an individual or family who lacks a fixed, regular, and adequate nighttime residence under Category 1. See Exhibit A

Homeless Prevention – A program targeted to individuals and families at risk of homelessness. Specifically, this includes those that meet the criteria under the “at risk of homelessness” definition at 24 CFR 576.2, as well as those who meet the criteria in Category 2, 3, and 4 of the “homeless definition and have an annual income **below 30%** of family median income for the area.

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

Permanent Housing – Community-based housing without a designated length of stay and includes both Permanent Supportive Housing and Rapid Re-housing.

Permanent Supportive Housing – Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Physical, Mental or Emotional Impairment – Expected to be long-continuing or of indefinite duration; substantially impedes the person’s ability to live independently and could be improved by more suitable housing.

Rapid Re-housing – Housing relocation and stabilization services and short- or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Assistance may be provided for up to 24 months during any

3-year period and may include rental arrears for up to six months, to eligible persons who qualify as homeless under Category 1 and 4 of the “homeless” definition. See Exhibit A and Exhibit C

Recipient – An applicant that signs a grant agreement with HUD.

Rent Reasonableness – A process conducted by the recipient or subrecipient to determine if the rent charge for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged for comparable unassisted units.

Safe Haven – For the purpose of defining chronically homeless, supportive housing that means the following: (1) serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services; (2) provides 24-hour residence for eligible persons for an unspecified period; (3) has an overnight capacity limited to 25 or fewer persons; and (4) provides low-demand services and referrals for the residents.

Street Outreach – The act of reaching out to unsheltered homeless people, connecting them with emergency shelter, housing or critical services, and providing urgent, **nonfacility-based** care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Subrecipient – A private nonprofit organization, State, local government, or instrumentality of State or local government that receives a subgrant from the recipient to carry out a project.

Transitional Housing – Facilitates the movement of homeless individuals and families to permanent housing within 24 months

Unsheltered Homeless – Individuals and families who qualify as homeless under Category 1(i) of the “homeless” definition. See Exhibit A

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.

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EXHIBIT A - HUD CRITERIA FOR DEFINING HOMELESSNESS

<p>Category 1</p>	<p>Literally Homeless</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> i. Has 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; ii. Is 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); <u>or</u> iii. Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
<p>Category 2</p>	<p>Imminent Risk of Homelessness</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; ii. No subsequent residence has been identified; <u>and</u> iii. The individual or family lacks the resources or support networks, <i>e.g.</i>, family, friends, faith-based or other social networks, needed to obtain other permanent housing
<p>Category 3</p>	<p>Homeless under other Federal Statutes</p>	<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> i. Are defined as homeless under other federal statutes listed at 24 CFR 576.2(3)(i); ii. 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; iii. 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; <u>and</u> iv. 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. <p>Note: CoC projects may serve unaccompanied youth and families with children under this category only if the CoC applies to HUD Field Office to serve such populations, and HUD approves the request. If approved,</p>

		<i>no more than 10% of the total amount of funds awarded to all recipients within the CoC may be used to serve Category 3 population.</i>
Category 4	Fleeing/ Attempting to Flee DV	<p>Any individual or family who:</p> <ul style="list-style-type: none"> i. 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; ii. Has no other residence; <i>and</i> iii. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing

EXHIBIT B - HUD CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS

<p>Category 1</p>	<p>Individuals and Families</p>	<p>An individual or family who:</p> <ul style="list-style-type: none"> i. Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u> 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 Category 1 of the “homeless” definition; <u>AND</u> iii. Meets one of the following conditions: <ul style="list-style-type: none"> A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance; <u>OR</u> B. Is living in the home of another because of economic hardship; <u>OR</u> C. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u> D. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u> E. Lives in 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 there reside more than one and a half persons per room; <u>OR</u> F. Is exiting a publicly funded institution or system of care such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution; <u>OR</u> G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Consolidated Plan. Additional characteristics of instability identified in the State of Nevada’s 2020-2024 Consolidated Plan are economic factors including households with severe cost burden and households facing unemployment.
<p>Category 2</p>	<p>Unaccompanied Children and Youth</p>	<p>A child or youth who does not qualify as “homeless” under the homeless definition but qualifies as homeless under another Federal statute listed at 24 CFR 576.2(2).</p>
<p>Category 3</p>	<p>Families with Children and Youth</p>	<p>An unaccompanied youth who does not qualify as “homeless” under the homeless definition but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with him or her.</p>

EXHIBIT C - CROSSWALK OF HUD HOMELESS AND AT RISK DEFINITIONS AND ELIGIBILITY TO ESG PROGRAM COMPONENTS

<p>Street Outreach</p>	<p>Individuals and families defined as “homeless” under the following categories are eligible for SO assistance:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless
<p>Emergency Shelter</p>	<p>Individuals and families defined as “homeless” under the following categories are eligible for ES assistance:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless • Category 2: Imminent Risk of Homelessness • Category 3: Homeless Under Other Federal Statutes • Category 4: Fleeing/Attempting to Flee DV
<p>Rapid Re-Housing</p>	<p>Individuals and families defined as “homeless” under the following categories are eligible for RRH assistance:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless • Category 4: Fleeing/Attempting to Flee DV (if the individual or family also lives in an emergency shelter or other place described in Category 1 of the “homeless” definition) <p><i>Note: Clients assisted through CoC-RRH programs, which are <u>funded through the CoC</u>, are eligible to receive assistance if the individual or family meets the definition of homeless under all four Categories.</i></p>
<p>Homelessness Prevention</p>	<p>Individuals and families defined as “at risk of homelessness” under the following categories are eligible for HP assistance:</p> <ul style="list-style-type: none"> • Category 1: Individuals and Families • Category 2: Unaccompanied Children and Youth • Category 3: Families with Children and Youth

EXHIBIT D - HUD HOMELESS STATUS RECORDKEEPING REQUIREMENTS

<p>Category 1</p>	<p>Literally Homeless</p>	<p>For subcategories i. and ii. of Category 1 of the “homeless” definition, acceptable evidence, by order of priority, includes:</p> <ol style="list-style-type: none"> 1. Written observation by an outreach worker of the conditions where the individual or family was living; <u>or</u> 2. Written referral by another housing or service provider; <u>or</u> 3. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; <p>For individuals exiting an institution, one of the forms of evidence above and:</p> <ul style="list-style-type: none"> • Discharge paperwork <u>or</u> documented written/oral referral, <u>or</u> • Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution
<p>Category 2</p>	<p>Imminent Risk of Homelessness</p>	<ul style="list-style-type: none"> • An eviction notice that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance: <u>or</u> • For individuals and families leaving a hotel or motel, evidence that they lack the financial resources to reside there for more than 14 days after the date of application for homeless assistance; <u>or</u> • A documented and verified oral statement by the head of household that the owner of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance; and • Certification that no subsequent residence has been identified; and • Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing
<p>Category 3</p>	<p>Homeless under other Federal Statutes</p>	<ul style="list-style-type: none"> • Certification by the nonprofit or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and • Certification of no permanent housing in the 60 days immediately preceding the date of application for assistance; and • Certification by the individual or head of household, and any available supporting documentation, that they have moved two or more times in the past 60 days; and • Documentation of special needs <u>or</u> 2 or more barriers including written diagnosis from a professional who is licensed by the state to diagnose and treat that condition, employment records, department of corrections records, literacy or English proficiency tests, or other reasonable documentation of the conditions.
<p>Category 4</p>	<p>Fleeing/ Attempting to Flee DV</p>	<p>For victim service providers:</p> <ul style="list-style-type: none"> • An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources and support networks to obtain other permanent housing. Statement must be documented by a self-certification or a certification by the intake worker. <p><i>For non-victim service providers:</i></p> <ul style="list-style-type: none"> • Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and • Certification by the individual or head of household that no subsequent residence has been identified; and

		<ul style="list-style-type: none">• Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
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EXHIBIT E - SAFETY ASSESSMENT TRIAGE TOOL (SATT) AND COMMUNITY HOUSING ASSESSMENT TOOL (CHAT)

The Safety Assessment Triage Tool (SATT) and Community Housing Assessment Tool (CHAT) allow homeless providers to assess and prioritize the universe of people who are homeless in a community and identify whom to treat first based on acuity of their needs. It is a brief survey that service providers, outreach workers, and even volunteers can use to determine an acuity score for each homeless person who participates. The scores can then be used to identify and prioritize candidates for different housing interventions based upon their acuity. Using the SATT and CHAT, providers can move beyond only assisting those who present at their particular agency and begin to work together to prioritize all homeless people in the community, regardless of where they are assessed, in a consistent and transparent manner.

To help with the solution of addressing and ending chronic homelessness in rural Nevada, the Rural Nevada Continuum of Care (RNCOC) has implemented the SATT and CHAT as part of the Coordinated Assessment/Entry and Referral System, to allow those with the highest vulnerability score to be referred to housing providers for housing vouchers. Case management is provided by homeless providers located within each community.

Training may be accessed in the Bitfocus online learning management system at:

<https://learn.bitfocus.com/>

EXHIBIT F - ESG ELIGIBILITY CRITERIA AND PRIORITIZATION TOOL FOR HOMELESS PREVENTION SYSTEM

Eligibility Requirements

All potential clients will be screened for the following:

Income – Only households with income **below** 30% of the Area Median Income are eligible for Homelessness Prevention services

PLUS

Trigger Crisis – An event has occurred which is expected to result in housing loss within 30 days due to one of the listed reasons (See Attachment A for qualifying trigger crisis)

PLUS

No resources or support network to prevent homelessness – No other options are possible for resolving this crisis. “But for this assistance” this household would become literally homeless, staying in a shelter, a car, or another place not meant for human habitation.

OR

Unaccompanied children and youth who qualify as homeless under another Federal statute – See “Runaway and Homeless Youth Act” definition. (See Attachment B for other definitions of homelessness)

OR

Families with children or youth who qualify as homeless under another Federal statute – See Runaway and Homeless Youth Act definition. (See attachment B for other definitions of homelessness)

PLUS

Score of at least 20 points – or 15-19 points with override sign-off (See attachment A for score sheet)

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HOMELESS PREVENTION RISK ASSESSMENT

Household Name/Identifying Number: _____

Date of Application: _____

1) Household will imminently lose their primary residence, and no subsequent residence has been identified, **AND** the household lacks the resources or support networks needed to obtain other permanent housing, **AND** household income is **less than** 30% of area median income as defined by HUD for area served.

No **STOP! Not eligible**

Yes **Continue**

2) **Trigger Crisis**

Household will lose housing within 30 days due to one of the following (check all that apply):

- _____ Household has moved twice or more in the past 60 days
- _____ Household is living in the home of another person because of economic hardship
- _____ Household has been notified in writing that the right to occupy their current housing or living situation will be terminated within 21 days after date of application
- _____ Household is living in hotel or motel and cost is not paid for by charitable organization or government program for low-income people
- _____ Household is living in SRO or efficiency unit where more than 2 people live; or a larger housing unit with more than 2 people per room
- _____ Person is exiting a publicly funded institution or system of care
- _____ Person is exiting a public or privately funded inpatient substance abuse treatment program or transitional housing program
- _____ Household is living in rental housing that is being condemned by a government agency and tenants are being forced to move out
- _____ Household is facing unemployment and/or a severe cost burden

3) **Prioritization Scoring**

Income Scoring

- _____ Rent burden is 66 – 80% of income 5 points **and**
- _____ Income at or below 15% AMI 20 points **or**
- _____ Income 16-29% AMI 10 points

4) Tenant Barriers/Risk Factors Scoring

Tally	Screening Barrier	Points per Barrier
_____	Eviction history	1 point
_____	No credit references/has not credit history	1 point
_____	Lack of rental history/has not rented in the past	1 point
_____	Unpaid rent or broken lease in the past (separate from current unpaid rent)	1 point
_____	Poor credit history/late or unpaid bills, excessive debt, etc.	1 point
_____	Past Misdemeanors	1 point
_____	Past Felony other than critical Felonies listed below	1 point
_____	Exiting criminal justice system where incarcerated for less than 90 days	1 point
_____	Critical Felony (drugs, sex crime, arson, crimes against other people)	5 points
_____	Pregnant or has a least one child ages 0-6	5 points
_____	Head of household under 30 years old	5 points
_____	Family experienced literal homelessness in past 3 years	5 points
_____	Adult in household with children	5 points
_____	TOTAL (Tally of Income & Tenant Barriers Scoring)	

Override

If a household has 15 to 19 points but the lead agency believes there is compelling reason to provide homelessness prevention services, the program can document reasons for overriding the score. The override must be signed off by an agency representative at a higher level of authority than direct service staff and documented in the case file.

ATTACHMENT B - OTHER DEFINITIONS OF HOMELESSNESS

- **Child Nutrition Act of 1966; section 17 (42 U.S.C. 1786)**

Child Nutrition Act of 1966 authorized numerous programs related to school lunches and breakfasts and funds for meals for needy students. For more information about these programs, contact the local School District.

- **Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.)**

Food and Nutrition Act of 2008 relates to the Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps. SNAP is administered by the U.S. Department of Agriculture (USDA). More information about SNAP can be found online at:

<http://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap>

- **Head Start Act (42 U.S.C. 9831 et seq.)**

Head Start funding is administered by the Office of Head Start (OHSO within ACF/HHS). A listing of Head Start programs, centers, and grantees is available online at:

<http://eclkc.ohs.acf.hhs.gov/hslc/HeadStartOffices>

- **McKinney-Vento Act; subtitle B of title VII (42 U.S.C. 11431 et seq.)**

McKinney-Vento Act authorized the McKinney-Vento Education for Homeless Children and Youths Program, which is administered via the Office of Elementary and Secondary Education within the U.S. Department of Education. More information about this program is available online at:

<https://www2.ed.gov/about/inits/ed/supporting-homeless-students/index.html> . Also contact the local School District's representative.

- **Public Health Service Act; section 330 (42 U.S.C. 254b)**

The Public Health Service Act authorizes the Health Center Program, which is administered by the Bureau of Primary Health Care within the Health Resources and Services Administration (HRSA) of HHS. Information about local Health Centers can be found online at: <http://www.bphc.hrsa.gov/index.html>

- **Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.)**

Runaway and Homeless Youth is administered by the Family and Youth Services Bureau within the Administration for Children & Families (ACF) of the U.S. Department of Health and Human Services (HHS). Information about the Runaway and Homeless Youth program grantees is available online at:

<http://www.acf.hhs.gov/programs/fysb/programs/runaway-homeless-youth>

- **Violence against Women Act of 1994; subtitle N (42 U.S.C. 14043e et seq.)**

Violence against Women Act established the Office on Violence against Women (OVW) within the U.S. Department of Justice (DOJ). OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault, and stalking. Currently, OVW administers one formula grant program and eleven discretionary grant programs, all of which were established under VAWA and subsequent legislation. More information about OVW is available online at: <http://www.justice.gov/ovw>

**RURAL NEVADA CONTINUUM OF CARE & STATE EMERGENCY SOLUTIONS GRANT PROGRAM
PERFORMANCE EVALUATION TOOL**

The following guidelines and program evaluation tool has been developed by the Rural Nevada Continuum of Care (RNCOC) and the State of Nevada Housing Division to determine if programs funded through the RNCOC and the State ESG Program are meeting the goals and objectives of the RNCOC.

Federal Performance Goals:

- Reduce lengths of homeless episodes
- Reduce new and return entries into homelessness
- Increase jobs and income

Background

The purpose of the HUD McKinney-Vento homeless assistance programs, as defined by the U.S. Department of Housing and Urban Development (HUD), is to reduce the incidence of homelessness in communities by assisting homeless individuals and families to quickly transition into permanent housing and self-sufficiency, and to assist eligible households who are at imminent risk of homelessness from becoming homeless. It is the expectation of HUD that programs funded through the McKinney-Vento homeless programs be evaluated annually to ensure goals and objectives set by the local CoC are met. In order to be consistent with 402(f) and 413(b) of the McKinney-Vento Act, ESG recipients must also consult with local CoC's in developing performance standards and evaluating outcomes of ESG-assisted projects; and CoC's must in turn analyze patterns of use of ESG funds and help evaluate outcomes for ESG-funded projects.

In the rural Continuum of Care the Governing Board (aka RNCOC Steering Committee) is the decision-making body responsible for the oversight of the RNCOC. The Grantee Peer Review Subcommittee evaluates the quarterly performance of RNCOC Grantees. The RNCOC Evaluation Subcommittee reviews local applications under the leadership of the RNCOC Coordinator, Winged Wolf Innovations (WWI), and provides funding recommendations to the Governing Board, while incorporating information provided by the Grantee Peer Review Subcommittee throughout the year. The State ESG Program Manager is responsible for reporting ESG-related data to the RNCOC Governing Board and the general membership.

Methodology

The RNCOC Governing Board has created goals to help the RNCOC, its grantees, and ESG subrecipients to meet certain objectives of HUD and the RNCOC. A program review process will be used to evaluate recipient performance with both federal and RNCOC goals. Evaluations will be assessed at least annually, and the timing of the program achievements will work in conjunction with completion of the annual consolidated funding application (the NOFO) to HUD, and the Consolidated Annual Performance Report (CAPER) submitted on behalf of the State ESG program.

The attached Program Performance Evaluation Report will be completed for each McKinney-Vento program funded within the RNCOC. A continuum-wide report will also be completed for all programs funded within the RNCOC. These reports will act as a performance evaluation tool and will indicate program achievement in each of the performance standards outlined below. Achievement of the established performance standard varies as defined by each standard. Points are allocated for each standard ranging from zero to twenty-five points, depending on the Standard. Performance standards will be marked as either "achieved", "not achieved" or "not applicable". Overall program achievement will be assessed based on the percent of all performance standards achieved.

RNCoC-funded programs which meet less than half of the performance standards will be considered “programs of concern” and may be required to develop a 12-month action plan for improving program performance in the area(s) identified as “not achieved”. Programs of concern may be required to provide quarterly progress reports to the RNCoC Governing Board at Steering Committee meetings. The Governing Board will assess the program performance at the end of the 12-month period and will determine if the program is improving in the areas identified and meeting federal and local goals. If the program performance has not improved significantly, as determined by the Governing Board, then the program may be at risk for reallocation or program repurposing during local HUD McKinney-Vento NOFO cycles (beginning with the 2014 NOFO).

State ESG funded programs which meet less than half of the performance standards may also be considered “programs of concern”. It shall be the responsibility of the State’s ESG Program Manager to develop an action plan with the applicable subrecipient, as defined under Section 8.0 of the ESG Program’s Policies and Procedures Manual, to ensure the goals and objectives of the ESG and the RNCoC are met. The State’s ESG Program Manager will provide status reports to the RNCoC Governing Board at least annually.

Program Performance Evaluation Report

All data generated for the Program Performance Evaluation Report will be derived from the Homeless Management Information System (HMIS), the RNCoC recipient’s Annual Performance Report (APR), or ESG reports obtained from the subrecipient or the State’s ESG Program Manager. Either the RNCoC’s Grantee Peer Review Sub-committee, the RNCoC’s Evaluation Sub-committee, or the State’s ESG Program Manager will work with the HMIS Administrator to obtain the necessary data to generate the Program Performance Evaluation Report.

Reallocations or Repurposing of RNCoC Funding

RNCoC funded programs which meet less than 50% of the performance standards will be considered “programs of concern” and will be required to submit a detailed corrective action plan for improving program performance in the area(s) identified as not achieved. Programs of concern will be evaluated by the RNCoC Evaluation Subcommittee when it is time to consider local applications for possible funding, reallocation or repurposing beginning with the 2014 HUD McKinney-Vento NOFO cycle.

Funding reallocation or repurposing will be determined and recommended by the RNCoC Evaluation Subcommittee as part of the NOFO process. Appeals on the basis of fact may be requested about the decision of the RNCoC Evaluation Subcommittee to reallocate program funding. An appeals review will be held, if necessary, and will be facilitated by the RNCoC Governing Board. (If a member of the Board is also a recipient of CoC funding they will recuse themselves from the appeals process.) The decision of the appeals review will be considered final. Funding reallocation would be contingent on HUD approval during the annual consolidated funding application process.

Program repurposing will be recommended by the RNCoC Evaluation Subcommittee and determined by a vote by the RNCoC Governing Board. Program repurposing will be recommended if a program is not performing up to the federal and local expectations and if there is an opportunity to improve performance and meet local and federal needs by changing the program model. Repurposing would mean working with the program and the local HUD office to reclassify the program from one program model to another. For example, a transitional housing program could be converted, or repurposed, to become an emergency shelter program, a permanent housing program, or a rapid re-housing program. The RNCoC Evaluation Subcommittee would work closely with the program staff and the local HUD office on the repurposing plan and the timeline for completion of the program repurposing. Program repurposing would be contingent on HUD approval during the annual consolidated funding application process.

Scoring Factors and Points Available

The following scoring system shall be used by the RNCOC Evaluation Subcommittee and the ESG Program Manager to complete the attached Program Performance Evaluation Report and will be used to determine whether or not a grantee or subrecipient is meeting objectives and outcomes as reflected

Factor	Points
1. Program serves "hard to serve" homeless population	25 (All participants)
2. Reduce length of homeless episodes and new and returned entries into homelessness	15 (RNCOC)
	35 (ES)
	5 (HP & RRH)
3. Increase jobs, income and self-sufficiency	35 (RNCOC/HP/RRH)
	15 (ES Only)
4. HMIS participation/Data Quality	15 (All participants)
5. Timely disbursement of grant funds	10 (All participants)
6. Families designated as homeless under other Federal programs	10 (HP programs only)
7. Priority households served	10 (RRH only)
Total Available	100
Bonus Points Available	Up to 30

25 point scale distribution	10 point scale distribution	5 point scale distribution
25 points = 95-100% achieved	10 points = 95-100% achieved	5 points = 91-100% achieved
24 points = 90-94% achieved	9 points = 90-94% achieved	4 points = 81-90% achieved
22 points = 85-89% achieved	8 points = 85-89% achieved	3 points = 71-80% achieved
20 points = 80-84% achieved	7 points = 80-84% achieved	2 points = 61-70% achieved
18 points = 75-79% achieved	6 points = 75-79% achieved	1 point = 51-60% achieved
17 points = 75-79% achieved	5 points = 70-74% achieved	0 points = 0-50% achieved
16 points = 65-69% achieved	4 points = 65-69% achieved	
15 points = 60-64% achieved	3 points = 60-64% achieved	
14 points = 55-59% achieved	2 points = 55-59% achieved	
13 points = 50-54% achieved	1 point = 0-49% achieved	
> 12 points = 0-49% achieved	0 points = 0-49% achieved	
	Outcome Achievement:	
	Outcome achieved = Y	
	Outcome not achieved = N	
	Outcome measure not applicable =N/A	

ATTACHMENT D - RNCOC & ESG PROGRAM OBJECTIVES AND OUTCOMES SUMMARY

RURAL NEVADA CONTINUUM OF CARE AND STATE ESG PROGRAM OBJECTIVES AND OUTCOMES SUMMARY	
Objective #1	Grantees shall assist “harder to serve” homeless populations
Outcome #1	All programs: Homeless PERSONS served will be “harder to serve” populations, having one or more of the following issues: Mental Illness, Alcohol Abuse, Drug Abuse, Chronic Health Conditions, HIV, Developmental Disabilities, Physical Disabilities, Domestic Violence, Unaccompanied Youth under age 18, or Unaccompanied TAY age 18-24 years
Performance Measures	<i>At least 50% of PERSONS served by program will be “harder to serve” homeless</i>
Objective #2	Grantees shall reduce length of homeless episodes, and new and returned entries into homelessness
Outcome #2(a)	PH program only: Homeless PERSONS will stay in PH over six months
Outcome #2(b)	TH program only: Homeless PERSONS in TH will exit to PH
Outcome #2(c)	TH Program only: Average days from program entry to exit into PH will be reduced year to year
Performance Measures	
Outcome #2(a)	<i>At least 80% of homeless PERSONS in PH stay over 6 months</i>
Outcome #2(b)	<i>At least 80% of homeless PERSONS in TH move to PH</i>
Outcome #2(c)	<i>Average days from program entry to exit into PH will reduce by at least 10%</i>
ESG Program Only	
Outcome #2(d)	Shelters only: Homeless PERSONS will exit from shelter into TH or PH upon discharge
Outcome #2(e)	Shelters only: PERSONS exited into TH or PH stayed less than 45 days in shelter
Outcome #2(f)	Rapid Re-Housing (RRH) only: Homeless PERSONS were provided access to PH
Outcome #2(g)	Homeless Prevention (HP) only: HOUSEHOLDS where stabilized and diverted from shelters
Performance Measures	
Outcome #2(d)	<i>ES: At least 10% of homeless PERSONS are placed into TH or PH upon discharge from shelter</i>
Outcome #2(e)	<i>ES: 20% of shelter PERSONS exiting into PH or TH stayed less than 45 days in the shelter</i>
Outcome #2(f)	<i>RRH: At least 80% of PERSONS placed in PH will remain after 6 months from exit</i>
Outcome #2(g)	<i>HP: At least 80% of PERSONS did not become homeless within 6 months of program exit</i>

Objective #3	Grantees shall increase jobs, income and self-sufficiency of program participants
Outcome #3(a)	All programs except ES: ADULTS in the household will have increased or sustained employment income; OR
Outcome #3(b)	All programs except ES: ADULTS in the household will have increased or sustained other cash income (not including ES clients); OR
Outcome #3(c)	All programs except ES: ADULTS in the household will have increased or sustained mainstream non-cash benefits; OR
Outcome #3(d)	All programs except ES: PERSONS shall have improved education by program exit
Outcome #3(e)	ES only: Homeless ADULTS residing in shelters shall have increased income from all sources (employment, benefits, mainstream resources)
Performance Measures	
Outcome #3(a)	<i>At least 20% of ADULTS will have increased or sustained employment income; OR</i>
Outcome #3(b)	<i>At least 54% of ADULTS will have increased or sustained other cash income; OR</i>
Outcome #3(c)	<i>At least 56% of ADULTS will have increased or sustained mainstream non-cash benefits; OR</i>
Outcome #3(d)	<i>At least 10% of ADULTS will have improved education by program exit</i>
Outcome #3(e)	<i>At least 20% of homeless ADULTS residing in shelters will increase income from all funding sources.</i>
Objective #4	Grantees comply with HMIS data quality standards
Outcome #4(a)	All programs: Percentage of PERSONS in housing and utilizing shelter beds who exit to known destinations
Outcome #4(b)	All programs: Income data for ADULTS will be collected at program entry and exit, and is updated at least annually
Outcome #4(c)	All programs: Limit # of DATA ELEMENTS with “Don’t Know”, “Refused”, and/or “Missing”
Performance Measures	
Outcome #4(a)	<i>At least 90% of PERSONS who exit programs will have “known destinations” fields completed</i>
Outcome #4(b)	<i>At least 90% of ADULTS will have income data collected at program entry and exit and updated at least annually</i>
Outcome #4(c)	<i>No more than 10% of DATA ELEMENTS reflect “Don’t Know”, “Refused”, and/or “Missing” as entries</i>
Objective #5	Timely disbursement of grant funds
Outcome #5(a)	CoC Programs: Grantee submit draw reimbursements at least quarterly and are on target to spend funds by end of grant period.
Outcome #5(b)	ESG Programs: ESG sub-recipients submit draw reimbursements at least monthly and are on target to spend funds by end of grant period.
Performance Measures	

Outcome #5(a)	95% of the time Grantees submit draw reimbursements at least quarterly and are on target to spend funds by end of grant period
Outcome #5(b)	95% of the time ESG sub-recipients submit draw reimbursements at least monthly and are on target to spend funds by end of grant period
ESG Program Only	
Objective #6	Assist families and youth defined as homeless under other Federal Programs
Outcome #6	HP only: Percentage of HOUSEHOLDS with children served shall meet the definition of homeless under other Federal Programs
Performance Measure	At least 50% of HOUSEHOLDS provided HP assistance met the definition of homeless under other Federal programs
Objective #7	Provide assistance to priority households
Outcome #7(a)	RRH only: A portion of HOUSEHOLDS provided access to RRH will be homeless families with children
Outcome #7(b)	RRH only: Homeless veterans shall be provided access to TH or PH
Performance Measure Outcome 7(a)	At least 25% of HOUSEHOLDS provided access to RRH will be homeless families with children
Outcome 7(b)	25% of homeless veterans served will be provided access to transitional or permanent housing
Bonus Points: Additional requirements to be reviewed annually (RNCoC grantees will be reviewed prior to the NOFO. ESG subrecipients will be reviewed at application and at year end for CAPER reporting)	
Objective #8	ES/TH/PH only: Increase utilization of available ES, TH and PH beds
Outcome #8	ES/TH/PH only: Bed utilization rates shall be greater than 65% and no more than 105%
Performance Measure	Average utilization rate for transitional, permanent, and emergency shelter beds is not less than HUD's standard of 65%, and does not exceed HUD's standard of 105%
Objective #9	All Programs: Integration with local Continuums of Care
Outcome #9	RNCoC grantees and ESG sub-recipients shall attend local Continuum of Care meetings
Performance Measure	RNCoC grantees and ESG subrecipients shall attend at least 75% of all local CoC meetings held annually
Objective #11	All Programs: Collaboration efforts
Outcome #11	RNCoC grantees and ESG subrecipients shall obtain sufficient cash and non-cash funds to meet match requirements for the CoC and ESG programs
Performance Measure	RNCoC Grantees shall obtain at least 25% match for programs funded through the CoC. ESG subrecipients shall provide enough match to cover no less than 100% of the ESG allocation
Objective #12	Coordination efforts
Outcome #12(a)	RNCoC grantees and ESG subrecipients shall engage other community partners to address issues of homelessness
Outcome #12(b)	Program participants shall be provided access and referrals to available resources

	<i>RNCoC grantees and ESG subrecipients shall participate in at least 4 local Workforce Investment Boards or Community Coalition meetings annually. May include Behavioral Health Task Forces, Community Health Coalitions, Housing Coalitions, or High Utilizer Coalitions.</i>
<i>Outcome #12(b)</i>	<i>RNCoC grantees and ESG subrecipients shall participate in local coordinated assessment/entry and referral systems in order to provide program participants with access to other available resources</i>
Objective #13	Discharge Planning
Objective #13	RNCoC Grantees and ESG subrecipients shall oversee local efforts to develop community-wide discharge plans
Performance Measure	<i>RNCoC Grantees and ESG subrecipients shall participate in community discharge planning initiatives that are documented via executed MOU's with other participating agencies</i>

**Rural Nevada Continuum of Care
&
State Emergency Solutions Grant Program
Performance Evaluation Form**

Agency Name: _____ Program Name: _____
 Program Type: Permanent Transitional ESG Amount Funded: _____
 Total # of ES/TH/PH Beds _____ Date of Assessment: _____ Monitored By: _____

Goal	Performance Measure	Data	Points Available	Actual Points	Achieved Y, N, or N/A <small>(N/A will receive full score)</small>
Project serves "harder to serve" homeless population	<p>All Programs: Select all "Harder to Serve" homeless or at-risk of homeless populations served:</p> <input type="checkbox"/> Mental Illness <input type="checkbox"/> Alcohol Abuse <input type="checkbox"/> Drug Abuse <input type="checkbox"/> Chronic Health Conditions <input type="checkbox"/> HIV <input type="checkbox"/> Developmental Disabilities <input type="checkbox"/> Physical Disabilities <input type="checkbox"/> Domestic Violence <input type="checkbox"/> Unaccompanied Youth under age 18 <input type="checkbox"/> Unaccompanied TAY age 18-24 years	HMIS, APR	<p>50% of persons in program meet any <u>one</u> criteria = 15</p> <p>50% of persons in program meet any <u>two</u> Criteria = 20</p> <p>50% of persons in program meet any <u>three</u> criteria = 25</p>		
Reduce length of homeless episodes and new and return entries into homelessness	<p>Permanent Housing (PH) only: At least 80% of homeless PERSONS in PH stay over six months</p>	HMIS, APR	15		
	<p>Transitional Housing (TH) only: At least 80% of homeless PERSONS in TH move to PH</p>	HMIS, APR	15		
	<p>Transitional Housing (TH) only: The average days from entry to exit into PH reduced by at least XXX days from the previous year</p>	HMIS, APR	15		

Reduce length of homeless episodes and new and return entries into homelessness (cont.)	Emergency Shelter (ES) only: At least 10% of homeless PERSONS are placed into transitional or permanent housing upon discharge from shelter	HMIS	15		
	ES Only: 20% of homeless PERSONS exited into TH or PH, shelter stay was less than 45 days	HMIS	20		
	Rapid Re-Housing (RRH) only: At least 80% of homeless PERSONS placed in permanent housing remain in that housing at least 6 months after program exit	HMIS	5		
	Homeless Prevention (HP) only: At least 80% of PERSONS did not become homeless within 6 months after program exit	HMIS	5		
Increase jobs, income and self-sufficiency	All programs except ES: At least 20% of ADULTS will have increased or sustained employment income; or	HMIS, APR	50% of persons in program meet any <u>one</u> criteria = 15 50% of persons in program meet any <u>two</u> Criteria = 20 50% of persons in program meet any <u>three</u> criteria = 25		
	All programs except ES: At least 54% of ADULTS will have increased or sustained other cash income; or	HMIS, APR			
	All programs except ES: At least 56% of ADULTS will have increased or sustained mainstream non-cash benefits; or	HMIS, APR			
	All programs except ES: At least 10% of PERSONS will have improved education	HMIS, APR	10		
	ES only: At least 20% of ADULTS residing in emergency shelters increased income from all sources	HMIS	15		
HMIS Data Quality	All programs: At least 90% of PERSONS in housing and utilizing shelter beds who exit programs will have “known destinations” fields completed	HMIS	5		
	All programs: At least 90% of ADULTS have Income Data updated at least annually, and at entry and exit	HMIS, APR	5		

	All programs: No more than 10% of DATA ELEMENTS reflect “Don’t Know”, “Refused” or “ Missing” as entries	HMIS	5		
Timely disbursement of grant funds	All programs: 95% of the time Grantees submit quarterly draw reimbursement requests by the due date and ESG subrecipients submit monthly draw reimbursement requests by the due date	Manual Report	95% -100 % = 10 80% - 95% = 5 < 80% = 0		
ESG Program Only					
Families and youth defined as homeless under other Federal programs	HP only: At least 50% of HOUSEHOLDS served met the definition of homeless under other Federal programs	HMIS	10		
Priority Household served	RRH only: At least 25% of HOUSEHOLDS provided access to housing will be homeless families with children	HMIS	5		
	RRH only: 25% of homeless participants served will be veterans who are provided access to transitional or permanent housing	HMIS	5		
Total Outcome Achievement			115 Points Available		
Points may be deducted with a history of grant funds returned to HUD, or who are currently at risk of recapture of grant funds.			Points Deducted (maximum of 10)		
Total Points Awarded					
Programs which meet less than 50% of performance standards will be considered “programs of concern”			Program Performance Percentage		
BONUS – Additional requirements to be reviewed annually (RNCOC grantees will be reviewed prior to the NOFO. ESG subrecipients will be reviewed at application and at year end for CAPER reporting)					
Increase utilization of available beds	ES/TH/PH only: Average utilization rate for transitional, permanent and emergency shelter beds is no less than 65%, and not more than 105%	HMIS	90% - 100% = 5 80% - 89% = 3 65% - 80% = 1 <65% = 0 >105% = 0		
Integration with local	RNCOC grantees & ESG subrecipients attend at least 75% of Continuum of Care meetings held annually	Manual Report	5		

Continuum of Care					
Collaboration efforts to obtain additional resources	RNCoC grantees and ESG subrecipients meet match requirement of 25% for CoC and 100% for ESG	Manual Report	101% & above = 5 95% - 100% = 3 85%- 94% = 2 < 85% = 0		
Coordination efforts	RNCoC grantees and ESG subrecipients participate in at least 4 local Workforce Investment Boards or Community Coalition meetings; and RNCoC grantees and ESG subrecipients participate in local coordinated assessment/entry and referral systems	Manual Report	3 7		
Discharge Planning	RNCoC grantees and ESG subrecipients participate in community discharge plans; documented by executed MOU's with at least 2 participating agencies	Manual Report	5		
BONUS POINTS			130 Maximum Points		
Program of Concern: Yes/No Recommendations for Improvement:					
Notes:					