



SAN DIEGO
**Regional Task Force
on the Homeless**

Regional Task Force on the Homeless Community Standards

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Introduction

“*A Street is Not a Home*”¹ reminds us that each day thousands of San Diegans are living on our streets or in places not meant for human habitation², without a home. This problem has not gone away. On a single night in early 2017, over 5,600 persons were found on the streets.³ Thousands more live in temporary housing or emergency shelter.⁴ To thrive, each man, woman, and child needs a safe and permanent home. By working together, we can help people find homes, we can end homelessness.

The Regional Task Force on the Homeless (RTFH) is the name of the San Diego Continuum of Care (CoC) which plans and coordinates the housing and supportive services system for homeless individuals and families. The mission of the CoC is to engage stakeholders in a community-based process that works to end homelessness for all individuals and families throughout the County of San Diego and 18 incorporated cities, to address the underlying causes of homelessness, and to lessen the negative impact of homelessness on individuals, families, and communities.⁵

The RTFH strives to be participant-centered and to provide services that are tailored to the unique needs and strengths of every person or family that is homeless. The service providers and other stakeholders of the RTFH service area are committed to providing empathic, consistent, non-judgmental support to homeless individuals and families; are willing to do whatever it takes to help people quickly access permanent housing and provide the right amount of support and facilitate community connections to maintain permanent housing. Effective service provision and positive outcomes for participants require that service providers operate using best practice approaches and interventions for ending homelessness as well as have a positive, hopeful, and supportive relationship with the participant.

These Written Standards (Standards) are intended to support RTFH efforts by offering a framework for service providers in the San Diego homelessness system that work together with mutual respect, collectively serving the needs of homeless individuals and families. The

¹ Coates, Robert C., 1990. *A Street is Not a Home: Solving America's homeless dilemma*. Prometheus Books.

² “a place not meant for human habitation” is HUD phrasing that describes a living condition that categorizes an individual’s episode of homelessness as “unsheltered”

³ Regional Task Force on the Homeless, 2017 WeALLCount Point in Time Count Summary Report accessed April 2017, RTFHSD.org.

⁴ Regional Task Force on the Homeless, 2016 WeALLCount Point in Time Count Comprehensive Report

⁵ San Diego Regional Continuum of Care Charter, June 2016, p.5.

Standards were developed by the Evaluation Advisory Committee for adoption by the RTFH Board and CoC agencies. They represent the norms of service delivery for our entire community and serve as a guide to the network of resources specifically targeted to address homelessness in the region.

The Standards were developed through a community process that included input from stakeholders and are subject to annual review and update, typically during the second quarter of the calendar year. The RTFH will provide access to the Standards for community stakeholders, including agencies receiving CoC Program, Emergency Solutions Grant (ESG), and grant funding⁶ targeted to homelessness and other social needs. The RTFH Standards are also designed to comply with the federal Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act⁷.⁸

For the benefit of program participants, once adopted by the RTFH Governance Board, the Standards will be applied to all programs and must be followed by programs that receive U.S. Department of Housing and Urban Development (HUD) funding through the CoC Program Competition, the Emergency Solutions Grant (ESG), and the State of California ESG program.

Although not required, programs that receive funding through other sources are also encouraged to follow these standards, and funders of housing services are encouraged to adopt the Standards for the programs they support. Because systems that are cohesive, inclusive, and share common goals and standards have collective impact, the RTFH will promote adoption of these Standards by all organizations providing housing and services to homeless individuals and families. Other entities that often touch the lives of homeless persons, such as healthcare, criminal justice, and education are encouraged to contribute to the development of system-wide standards.

Adhering to the Standards is critical to the coordination and effective use of resources. When the RTFH is evaluating applications for funding and requests for letters of support, those that choose not to abide by the Standards will not be approved. The Standards include prioritization requirements for each program type that are updated to ensure the effective implementation of

⁶ Targeted funding refers to funding sources that either require or give preference to projects endorsed by the CoC, such as Veterans Affairs, Supportive Services for Veteran Families; Funder's Together to End Homelessness

⁷ Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009. 42 USC 11301

⁸ Requirements are found in: U.S. Department of Housing and Urban Development, 2012 Interim Rules. Subpart B Responsibilities and Operating CoC, p 15; and 24 CFR 578.7 (a) 9.; and referenced in the 2016 CoC Competition NOFA.

the Coordinated Entry System (CES)⁹ which aims to place program participants in the appropriate housing intervention to end the participants' homelessness. Established policies and procedures provide detailed information about the CES and guide system implementation¹⁰.

The RTFH has established operating principles and standards to support effective implementation of the homeless service system. Standards and descriptions for key components of the system include community-wide, system-level practices and procedures such as Housing First, CES, and the Homeless Management of Information System (HMIS); agency-level activities such as grievance procedures and reporting; and individual project activities for each project type such as outreach and emergency services, transitional housing, bridge housing, rapid rehousing and permanent supportive housing.

Section I: System Level Principles and Standards

This section addresses the principles and standards for system-level operations.

System Principles

In keeping with the goals and objectives of the RTFH, activities provided through local agencies should work together to support the mission of ending homelessness and lessening the negative impacts of homelessness on people experiencing homelessness and on communities. A series of principles and best practices have been developed and are integral to ensuring that homelessness is rare, brief, and non-recurring¹¹ and in establishing new homeless services programming in the future. Core concepts include:

- Fully embrace a Housing First approach that includes the use of low-barrier strategies and policies including Harm Reduction, operating from the perspective that homelessness is first and foremost a housing problem and the system should act as a flexible coordinated crisis response system to provide access to permanent housing as quickly as possible.
- System-wide coordination for assessment, prioritization, and access to the homeless assistance system and programs using the Coordinated Entry System

⁹ The Coordinated Entry System (CES) was previously known in San Diego as the Coordinated Assessment and Housing Placement system or CAHP

¹⁰ Details on the CES Policies and Procedures are available on the Continuum of Care website.

¹¹ Housing First requirements from "Housing First Checklist: A Practical Tool for Assessing Housing First in Practice, United States Interagency Council Homelessness," (http://usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf). See also National Alliance to End Homelessness (www.endhomelessness.org)

- Use of evidence-based and data-driven practices that promote on-going evaluation of system and program data for continuous process improvement and that inform funding and resource allocation decisions
- Respect for the dignity and autonomy of the person
 - Trauma-informed systems of care
 - Recognition of the importance of relationship building
 - Respect for cultural competence and non-discriminatory practices
 - Flexible, program participant-driven, and strengths-based service delivery
 - Participant self-determination (i.e. participants select from a menu which offers a variety of services that are flexible and appropriate for the participant in various stages of change)
 - Developmentally appropriate services (i.e. families, youth)
- Civic engagement and systems advocacy: engagement of agencies and participants
- Centralized recordkeeping using an approved HMIS
- Governance of the RTFH comprised of representatives from various stakeholder groups, including homeless or formerly homeless persons.
- Commitment to meeting the requirements in the HEARTH Act with the goal of exceeding minimum expectations
- Use of an approved Emergency Transfer Plan to promote safety of tenants in accordance with the Violence Against Women Act (VAWA)

System-Level Standards

Housing First Orientation

Housing First is an evidence-based approach and is the most effective approach to ending homelessness.¹² Housing First seeks to offer individuals and families experiencing homelessness immediate access to permanent affordable or supportive housing, with a low-threshold for entry, and without clinical prerequisites like completion of a course of treatment or evidence of sobriety¹³. Housing First is an overarching philosophy and approach that can be applied to all homeless assistance programs, and Housing First also encompasses two specific intervention types; 1) Permanent Supportive Housing (PSH) and 2) Rapid Re-Housing (RRH).

Housing First Permanent Supportive Housing models are typically designed for individuals or families who have complex health and behavioral health needs requiring intensive services, as well

¹² This quote from USICH (footnote below) is supported by articles available on-line at *Research Matters: Homelessness Hub*, http://homelesshub.ca/search-resources?keywords=housing+first&resource_type=All&publication_date=1970-01-01+00%3A00%3A00&sort_by=created&sort_order=DESC, accessed April 2017.

¹³ USICH: <https://www.usich.gov/tools-for-action/housing-first-checklist>, Sept. 28.2016

as have lengthy and/or repeated episodes of homelessness. Permanent Supportive Housing Programs (PSH) are longer term in nature and housing and services are offered indefinitely based on need, to participants who are often turned away from other affordable housing settings, and/or who are the least likely to be able to proactively seek and obtain housing on their own.

Housing First approaches for RRH provide quick access to permanent housing through targeted housing search and identification, the provision of short-term rental assistance based services and supports. Time-limited housing or rental assistance has also been recognized to address the housing needs of unaccompanied youth and persons fleeing domestic violence. The system is designed to have low barriers for program admission, and to serve individuals and families without consideration of past rental, credit or financial history. HUD recognizes that Housing First yields¹⁴ high housing retention rates, low returns to homelessness, and reductions in crisis or institutional care¹⁵.

The Housing First approach has evolved to encompass a community-level orientation to ending homelessness in which barriers to housing entry are removed and efforts are in place to prioritize the most vulnerable and high-need people for housing assistance first. A Housing First philosophy can be used in all phases of the homeless housing and services system.

At a systems level, all entities affiliated with the RTFH including agencies, board members, funders, staff, and partners embrace the following:

1. All people can achieve housing stability in permanent housing with the right supports
2. Everyone is “housing ready”
3. Improved quality of life, health, mental health, and employment can be achieved through housing
4. All clients have the right to self-determination, dignity and respect
5. The configuration of housing and services should be based on participants’ needs and preferences.¹⁶

¹⁴ Gubits, Daniel, et al. "Family Options Study: Short-term impacts of housing and services interventions for homeless families." Washington, DC: US Department of Housing and Urban Development (2015).

¹⁵ Somers, Julian M., et al. "A Randomized Trial Examining Housing First in Congregate and Scattered Site Formats." *PloS one* 12.1 (2017): e0168745.

¹⁶ HUD and USICH: Core Principles of Housing First and Rapid Re-Housing Webinar. July 22, 2014

What Happens with a System-wide Orientation to Ending Homelessness?

- First, strong and direct referral linkages and relationships exist between the crisis response system (emergency shelters, street outreach, etc.) and the CES which manages participant access to RRH and PSH, or when necessary, Transitional Housing (TH). Crisis response providers are aware and trained in how to assist people experiencing homelessness to enter the CES and to work with a Housing Navigator toward permanent housing. For those who experience homelessness and are not prioritized for RRH or PSH, the crisis response system provides referrals to other resources and services that support participants in exiting homelessness on their own.
- Next, RTFH's region-wide CES which matches people experiencing homelessness to the most appropriate housing and services, becomes an even more critical lynchpin component of the system. CES allows participants a unified, streamlined, and user-friendly way to access RRH, PSH, and/or other housing interventions.
- The CES system's data-driven approach to prioritizing highest need people for housing assistance supports Board policy, which prioritizes persons with the longest terms in homelessness, and those with the highest level of special needs. Data from the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) which is the Common Assessment Tool (CAT)¹⁷, length of stay information from the HMIS, or data on utilization of crisis services such as health care of criminal justice systems help document the level of participant need
- In addition, policymakers, funders, and providers collaboratively conduct planning and raise and align resources to increase the availability of affordable and supportive housing to ensure that a range of housing options and models are available to maximize housing choice among people experiencing homelessness. A stakeholder can recommend new resources and solutions for the RTFH to consider for adoption.
- There is a San Diego County provider community that promotes entering housing to reduce health and safety risks for homeless persons, enhances potential participation in services, and provides opportunities for increased access to care. With a system-wide perspective, emergency shelter, street outreach providers, and other parts of the crisis response system work to align with Housing First and to recognize that their roles encompass housing advocacy and rapid connection to permanent housing. Persons staffing the crisis response system services operate under the philosophy that all people experiencing homelessness are 'housing ready'. This philosophy assumes that each person is ready to be permanently

¹⁷ The Common Assessment Tool is an instrument that is approved by the RTFH Board and is used for initial assessment of housing need. The approved tool is available at www.CoCSanDiego.org.

housed and does not require training or a stay in an entry-level program or shelter prior to being permanently housed.

- It is commonly understood that the shift to a system-wide orientation to ending homelessness means adhering to Housing First principles. The RTFH will review agency and program adoption of Housing First Principles, offering support where needed. The guidelines found in the Agency Level Standards section below have been created to minimize barriers to housing whenever possible, recognizing that this may not be feasible under all circumstances. In some cases, there may be other entities, including, but not limited to, private landlords, the criminal justice system, and funders that place additional tenant requirements upon program participants.
- Finally, for the system-wide approach to accelerate change, all agency-level and program-level standards will align with HUD, Housing First, and Low-Barrier, and rapid movement to housing protocols. Program reviews described in this section will be conducted internally by the RTFH on behalf of the Evaluations Advisory Committee.

Coordinated Entry System

The CES (previously known as the Coordinated Assessment and Housing Placement or CAHP) is a centralized system for people with a housing crisis to access local housing programs targeted for people who are homeless. The Board has adopted policies, procedures, and participation rules for the CES System for the San Diego CoC. Participants will be assessed and access CoC housing resources following the adopted CES Policies and Procedures Handbook.¹⁸ The Handbook includes extensive guidelines for participation in the CES system. Outreach, assessment, or housing programs must abide by coordinated entry and housing placement standards as described in the Handbook.

Participants are enrolled in CES after completing the CAT. Verification of information from the CAT and basic personal characteristics (referred to as the “Universal Data Elements” in HMIS) must be maintained in participant files. There are specific documents needed by CES to verify the assessment in order for scoring and matching to be completed. These include the participant profile VI-SPDAT or VI-F-SPDAT, evidence of homeless status, documentation of the length of time in homelessness, disability, chronic homelessness criteria, and veteran’s status. Any agency providing housing intervention projects is required, and others are strongly encouraged, to use the HMIS for participant and program data. Agencies that do not use HMIS can partner with Coordinated Entry staff to make alternate arrangements for referring participants to

¹⁸ See CAHP Policies and Procedures, adopted May 2016. Link <..\Advisory Committee 2015\CAHP Subpopulations\1. CAHP P & P.pdf>

the prioritization list. Details can be found in the CES Policies and Procedures Guide (CES P &P).

State and federal regulations¹⁹ require special protections for domestic violence (DV) survivors. Particular attention is related to tenant's rights and protection of personal information. The CAT includes supplemental questions to help identify DV victims so that alternate record-keeping protocols can be followed in order to ensure protection of DV households. The CES P & P Guide contains the most recent Standards for households in this special population.

Minimum Standards

1. **Prioritization:** Follow Board-established priorities to ensure that the most vulnerable participants are served first, by using the approved CAT which measures the length of homelessness, chronic homeless status, vulnerability, and severity of need.
2. **Low Barrier:** CES staff partner with programs and systems that have low barriers. Participants are served through Coordinated Entry regardless of income level, drug or alcohol use and criminal background.
3. **Housing First Orientation:** The purpose of the system is to house participants as quickly as possible. Policies assume that all persons are 'housing ready'.
4. **Rapid Movement to Permanent Housing:** participants move directly to permanent housing as soon as it is available without needing to transition through other programs, or without having to participate in services for a specific period.
5. **Person-Centered:** Participants can accept or deny services from any agency without losing their spot on the prioritization list until placed in housing. The housing unit which is rejected by a participant can be offered to the next appropriate participant in the CES system. Subsequent vacancies that match the profile will be offered to the first participant until housing is achieved.
6. **Fair and Equal Access:** All programs and services will adhere to Fair Housing Standards. All participants in the RTFH geographic area can access services through the established CES. Services are offered in English and Spanish. Translation services are made available as needed. Going forward, The CES system will be advertised and promoted in ways that make information available to non-English speakers and persons with disabilities.
7. **Standardized Assessment:** All agencies will use the CAT as approved by the Board.

¹⁹ U.S. Department of Housing and Urban Development. (2010) 24 CFR Parts 5, 91, 880, et al. HUD Programs: Violence Against Women Act Conforming Amendments; Final Rule; Violence Against Women and Department of Justice Reauthorization Act of 2005, 42 U.S. Code § 1437f(5). ; Marsy's Law, the California Constitution article I, § 28, section (b)

Each subpopulation will be assessed through the CES and provided access to housing in accordance with approved CES policies and procedures. To ensure safety and efficiency, participants may be directed to different assessment centers or access points.

8. Referral Protocols: CES will refer participants to appropriate housing services including ESG and projects funded by HUD CoC Competitive grants. CoC HUD-funded and ESG funded projects are required to fill housing vacancies with participants that are matched to their projects through the CES system. All homeless housing projects must use the CES system for as the system becomes available for that project type. People accepted into housing must be recorded in the HMIS so that the prioritization lists remain current.
9. Outreach: Street outreach workers will administer the CAT, or refer people to assessment sites, and enter the participant in HMIS so that participants can be prioritized and be added by HMIS to the appropriate By Name Lists.
10. Access points: The RTFH ensures full access to the CES through multiple assessment and access points throughout the CoC geography. Access centers will assess any participant experiencing homelessness or at risk of homelessness in the CoC. Information about access points will be provided on the RTFH website and through a centralized telephone number²⁰.

Emergency Transfers for Victims of Violence

The RTFH promotes the safety of tenants in CoC-supported housing by establishing policy and protocols for transferring housing relocation for tenants who are at imminent risk of harm if they remain in their current housing unit. This policy and protocols are referred to as an Emergency Transfer Plan (ETP). The RTFH ETP is designed to comply with the Violence Against Women Act (VAWA) and work cooperatively with other components of the region-wide system.

Requests for emergency transfer are available regardless of sex, gender identity, or sexual orientation. The ability of provider to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether provider has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

The Emergency Transfer Plan found in the Appendices is incorporated into these Written Standards by reference.

Section II: Agency-Level Principles and Standards

This section addresses the operating principles and standards to be followed at the agency-level.

Principles

Homeless housing and service providers will consider the system principles detailed above when planning and implementing programs and will work together with other service providers and

stakeholders to uphold these principles for the benefit of all individuals and families who are homeless. The agencies are also responsible for:

- Maintenance of at least minimum records in the HMIS are required, however more in-depth use of the HMIS is encouraged
- Systems collaboration, sharing, and utilizing agency expertise to achieve the greatest impact
- Active participation in the CES
- Offering programs that are safe and welcoming for all who are eligible to access services
- An organizational commitment to excellence and accountability

²⁰ Currently 2-1-1

- Continuum accountability: Agencies understand program impacts and communicate changes in programs (i.e. closures, elimination of units) to prevent the displacement of participants and utilize all available resources
- Ensure fiscal responsibility (adheres to regulatory standards for tracking and use of funds)
- Commitment to staff training and development
- Use of evidence-based practices (such as trauma-informed care)
- Adherence to applicable regulations and law (Fair Housing laws/Americans with Disabilities Act/Section 504, etc.)
- Play an active role in connecting participants to, and ensure coordination with other services and systems of care, such as:
 - Eligibility screening for and application to mainstream services. Examples of these programs include: HUD public housing programs, Section 8 tenant based rental assistance, HOME²¹, CalWorks, Medi-Cal, Head Start, Social Security, Supplemental Security Income, Social Security Disability Insurance, CalFresh, and Veterans' Affair programs.
 - Coordination with other systems of care, such as foster care, in-home health services, probation or corrections, substance use and/or mental health treatment, and employment or education services that are supported by a variety of resources.

Standards

*Housing First Standards for Agencies*²²

- The agency verbally explains program eligibility criteria, which align with the Housing First philosophy, to participants, and provides the criteria in writing when requested.
- The project has admission/tenant screening and selection practices that promote the acceptance of applicants regardless of their sobriety, use of substances, criminal history, completion of treatment, or participation in services.²³

²¹ HOME refers to the HOME Investment Program which offers grants to states and units of general local government to implement local housing strategies designed to increase homeownership and affordable housing opportunities for low and very low-income Americans. Retrieved March 23, 2017 from <https://portal.hud.gov/hudportal/HUD?src=/hudprograms/home-program>

²² See CAHP Policies and Procedures, adopted May 2016

²³ An eligibility matrix of CES criteria is found in the appendices.

- The project accepts participants who are diagnosed with or show symptoms of a mental illness.
- The project has and follows a written policy that: does the following:
 - States that taking psychiatric medication and/or treatment compliance for mental illness is not a requirement for entry into or continued participation in the project.
 - States that sobriety and/or treatment compliance for substance use disorders is not a requirement for entry into or continued participation in the project, unless the project is specifically a substance abuse treatment facility.
 - Provides harm-reduction services that are readily available and engaging
 - Accepts participants without regard based on previous criminal history that is not relevant to participation in the program, and accepts participants to the project regardless of criminal convictions, unless there is a serious concern for the safety of other residents in a site-based project.
 - Does not reject participants based on prior rental history or past evictions in the project.
 - Accepts participants into the project regardless of lack of financial means.
 - Accepts participants into the project regardless of past non-violent rule infractions within the agency's own program and/or in other previous housing.
- The project agrees to allow participants to remain in the project if they require an absence of less than 90 days due to the reasons outlined below, unless otherwise prohibited by law or funder policy:
 - Substance use treatment intervention
 - Mental health treatment intervention
 - Hospitalization and short-term rehabilitation
 - Incarceration
 - Other service- related reason approved by an agency supervisor

Participant Empowerment

Participant choice is a fundamental part of an effective Housing First approach. Homeless service and housing agencies in the CoC empower participants through uniform standards and processes.

Minimum Standards

1. Participants are provided with opportunity for self-determination and choice in selecting specific housing and services within the housing intervention per CAT assessment. A Housing Navigator or case manager supports the participant selection during the housing match and program placement process.
2. Participants retain their place in the prioritization list until permanent housing placement is accomplished. A unit that is rejected by one participant can be offered to the next appropriate participant in the CES system. Subsequent vacancies are offered to the first participant until housing is successfully accomplished.

3. Participants are given regular opportunities in decision-making for programs and services, such as participation on an operating board, a tenant board, or a consumer input panel.
4. Participant feedback on programs and services is solicited at least annually.

Appeals and Grievance Procedures

Occasionally, participants or residents may be denied assistance or may want to issue a complaint about a program or service. Agencies are responsible for implementing a termination or grievance process that meets at least the following minimum standards.

Minimum Standards

1. All agencies must advise program participants of behaviors or conditions that are grounds for termination and have posted and advertised appeals or grievance policy and process. The conditions that are grounds for termination should be aligned with Housing First principals including low-barrier programming.
2. Have a consistent method for filing an appeal or grievance and a timeline for the agency to respond to an appeal or grievance.
3. Provide contact information for the person designated to receive a grievance or complaint.
4. Agencies reserve the right to reinstate services to meet program rules or applicable laws without having to conduct a new CES assessment process.
5. Agencies may reserve the right to reinstate services following an appeal that rules against them and in favor of the client without having to do a new assessment.

Termination of Housing Assistance

Provider-initiated termination of housing assistance should be rare and used only as a last resort to ensure safety or compliance with regulations, laws, or the signed lease agreement. Agency and programs are expected to maintain a low-barrier, housing –first approach to services, and to follow the minimum standards described below.

Minimum Standards

1. Housing programs adhere to low-barrier criteria²⁴ meaning that the program will not terminate housing assistance to the participant for
 - Failure to participate in supportive services
 - Failure to make progress on a service plan
 - Loss of income or failure to improve income

²⁴ HUD description of low- barrier criteria are found in the 2016 CoC NOFA

- Fleeing domestic violence
 - Any other activity not covered in a lease agreement typically found in the mainstream housing market.
2. All agencies must advise program participants upon entry of behaviors or conditions that are grounds for termination.
 3. Nothing in this section prevents an agency from reinstating services pursuant to applicable program rules or law.

Record Keeping Requirements

Housing and service information will be retained in a centralized HMIS, which will be maintained as described in the approved HMIS Participation Policies and Procedures.²⁵ In accordance with federal regulations²⁶, programs designed to exclusively serve domestic violence victims will maintain client-level records in a secure, comparable database and provide information to the HMIS for program-level and system reports. Electronic submittal of records in accord with established HMIS policies is strongly encouraged for all agencies, regardless of funding source.

Agencies are responsible for knowing the reporting requirements for each funder and program. Documentation of the delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

Minimum Standards

1. Each participant file should contain, at minimum, information required by funders, participation agreements and/or signed lease agreements, service plans, case notes, information on services provided both directly and through referral, and any follow-up and evaluation data that are compiled. Again, the use of an electronic client file in HMIS is strongly encouraged.
2. Participant information will be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures (HMIS P&P) manual. Agencies are responsible for remaining aware of changes in HMIS P&P and for timely compliance with changes.
3. Financial recordkeeping requirements include documentation of all costs charged to the grant, funds being spent on allowable costs, the receipt and use of program income, compliance with expenditure limits, and deadlines and match contributions.

²⁵ HMIS P & P were Board approved, 2016, located at www.rtfhsd.org

²⁶ HUD Regulations 24 CFR 587 and HMIS operating standards

4. 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 prior to release of any participant identifying data to be utilized for research, teaching and public interpretation.
5. Files must be saved for a minimum of five years beyond the term of assistance, or longer if required by a program funding source.

Section III: Program-Level Principles and Standards

This section provides the principles and standards for various types of housing and service programs.

Principles

In addition to the general system principles and agency standards outlined above, the following principles guide program level services:

1. In providing or arranging for housing, shelter, or services, the program will consider the needs of the individual or family experiencing homelessness.
2. The program will aid households in accessing suitable housing as quickly as possible.
3. The program is aligned with RTFH established policies and priorities, and current HUD priorities, including priorities for facility usage and ending homelessness among specified sub-populations.
4. The CAT is used to screen households for homeless housing programs. The approved version of the screening tools is posted on the CoC website. It is administered by trained and approved personnel and volunteers. Data from assessments is entered into the CoC-approved HMIS.
5. The program fully participates in the CES system and follows CoC-approved priorities when determining placement priority and housing program type for a participant.
6. Programs ensure access to education for children. Each housing and housing case management program must be aware of, and inform family and youth-only households of the educational rights of children and unaccompanied youth in their programs. Programs serving families or youth will adhere to the provisions of the adopted CoC Educational Assurances policy. Each organization will implement the policy by public posting of client rights to education, and through designation of staff who are responsible for collaboration with McKinney-Vento School Liaisons or other school officials to coordinate educational services. Program staff will highly encourage school attendance and will work with households to address any barriers to regular school attendance.
7. Each program in the CoC will minimize their eligibility criteria as described in and strive to accept and accommodate all people fitting the criteria

8. Each program in the CoC will provide accurate and up-to-date information on eligibility criteria for participation in the program; e.g. – gender specific, household type (individual/family), disability
9. Each agency will provide information to the HMIS. Each program participating in the HMIS will follow the HMIS Policies and Procedures as adopted by the RTFH Board.²⁷
10. Each housing and housing case management program in the CoC will maintain eligibility, service, and benefits documentation for each participant. A mainstream benefits checklist should be completed in HMIS and all verification documents should be kept in the file for each household and updated annually.
11. Each program will ensure language translation services are available for participants when needed. These services may be provided through a third-party or community resource if necessary.

Program Level Standards

In addition to general program standards, the RTFH has identified standards for each specific project type comprising the system targeting homeless individuals and families. For all programs, participants must be homeless and meet specific eligibility requirements such as meeting the definition of homelessness. The Standards use the four categories defined by HUD, found Appendix A, and summarized in highlight boxes.

HUD’s Four Categories of Homeless

Category 1: Literally Homeless

Category 2: Imminent Risk

Category 3: Category 3: Homeless Under other Federal Statutes
(Note: CoC funds cannot currently be used for this category).

Category 4: Fleeing/Attempting to Flee Domestic Violence

Details for each category are provided in highlight boxes.

²⁷ www.RTFHSD.org. HMIS Policies and Procedures manual, adopted 2016.

Category 1: Literally Homeless

Is an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 3: Homeless Under Other Federal Statutes

Is an unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:

- Are defined as homeless under the other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- Have experienced persistent instability as measured by two moves or more in the preceding 60 days; and
- Can be expected to continue in such status for an extended period due to special needs or barriers.

Category 2: Imminent Risk

Is any individual or family who will immediately lose housing, meaning:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- Household lacks the resources or support networks needed to obtain other permanent housing.

Category 4: Fleeing/Attempting to Flee Domestic Violence

Is any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

ESG Programs²⁸

The Emergency Solutions Grant program and the HUD CoC program are intended to work together. Federal rules require collaborative planning for use of ESG and CoC funds. This section of the Standards focuses on special system coordination for ESG and CoC. A variety of project types and services are supported through ESG funds. Project-level standards also apply to ESG programs unless otherwise noted.

Description

ESG programs receive funding from HUD. The program provides support for outreach, prevention, emergency shelter and essential services, and rapid rehousing. ESG funds provided to local jurisdictions can only be used in targeted areas within the RTFH geography. State ESG funds flow through an Administrative Entity (AE) selected by the RTFH Board and are intended for use in areas that do not have a direct ESG allocation.

Eligibility

Participants must meet the HUD definition of homeless and have income below 30% Area Median Income.

Access

In consultation with recipients of ESG's program funds within the geographic area, the RTFH establishes and consistently follows Written Standards for providing CoC assistance. The ESG program principles and standards are detailed in the ESG Policy and Operations Guidebook²⁹. ESG Standards include:

1. Coordination with the RTFH to ensure effective use of resources
2. Compliance with the RTFH Written Standards except as required by the ESG program regulations such as income eligibility limitations, housing inspection standards or terms of assistance. The standards for determining housing and rental assistance participation are further described in the ESG Policies and Operating Guidelines.³⁰
3. Registration of participants in the CES System

²⁸ ESG program standards are required by the HUD 2012 Interim Rule.

²⁹ Updated in December 2014. Link:

³⁰ As accepted by the CoC and ESG Entitlements in 2013, and amended December 2014. [..\ESG program\ESG Policies and Procedures\ESG Policies and Procedure GUIDE bk -2014 PDF.pdf](#).

4. Policies and procedures for evaluating individual's and family's eligibility for assistance
5. Policies and procedures for determining and prioritizing which eligible individuals and families will receive a particular type of housing assistance (PSH, RRH, TH, or other)
6. Standards for determining what percentage or amount of rent each program participant must pay while receiving RRH assistance;

Street Outreach

Description

A set of strategies of outreach and engagement, in the geographical location where individuals and families experiencing homeless reside, including streets, parks, campsites, abandoned buildings, cars, and other places not meant for human habitation with the intention to establish relationships, build trust and rapport, provide necessities, and begin the process to link households to housing and support services.

Eligibility Criteria

There are no individual eligibility criteria for receiving street outreach services.

Targeted Populations

- Individuals and families who are present on the street or places not meant for human habitation; and
- Who have been underserved; or
- Do not know about services; or
- Believe they do not need services; or
- Do not, or think they do not, qualify for services

Priority Populations

- Follows CoC priority policy (See Appendix B: San Diego CoC Prioritization Policy)
- Individuals and families who have the longest history of homelessness.
- Individuals and families with most severe needs, particularly mental health or substance abuse disability.
- Veterans and chronically homeless persons

Program Standards

1. Build relationships over time with the goal of moving people from the street into permanent housing.

2. Assure services meet people where they are at and provide low-demand, street-based services. Services should not include trying to get people to access treatment services for substance use or mental health unless that is the participant's goal. All services are focused on securing permanent housing, not the connection to shelter or other temporary housing programs.
3. Address basic needs such as ensuring access to food, clothing, and safety.
4. Provide access to medical care, transportation, mental health care, substance abuse treatment as quickly as possible.
5. Understand that outreach is an interactive process.
6. Are connected to the CES system and outreach staff use the community's CAT to enroll participants in CES or refer participants to Assessment site.
7. Ensure all participants requesting housing are referred to shelter while waiting for PSH or RRH.
8. Maintains records documenting outreach efforts and participant's choice to accept or refuse housing opportunities.
9. Provides outreach to known individuals at least every two weeks³¹.
10. Expedites access to housing and services for persons on established By Name Lists for priority populations.
11. Ensures all participants are registered in the HMIS.
12. Offer participants housing assessment and referral at least every two weeks.

Minimum Performance Benchmarks for Street Outreach

Performance thresholds for this service area will be determined as aggregate data becomes available.³²

Emergency Shelter/ Interim Housing and Bridge Housing

Description

Emergency Shelter and Interim Housing, and Bridge Housing operate as a low-barrier residence that provide a safe, secure, and clean place to stay for those who cannot be diverted from the homeless assistance system. These programs are intended to be a short-term bridge to placement in permanent or more long-term housing options and provide support with accessing housing resources in the community as quickly as possible. Although each operates from the same framework and share the goal of providing a temporary residence while moving toward permanent housing, there are

³¹ Per the 2016 By Name List policy

³² In keeping with the principle of data-driven decision-making, the Standards will be updated after sufficient data has been collected.

unique differences among the three. The following are definitions of each that highlight key distinctions:

1. **Emergency Shelter:** Safe, short-term program that provides basic services such as temporary housing, restrooms, meals, and services focused on supporting an individual or family access permanent housing as quickly as possible. The key distinction is that some Emergency Shelter programs may only operate as seasonal, inclement weather or rotational shelter services and may be open for less than 24 hours a day and operate for periods during the year as permitted by special arrangement with local jurisdictions. Given that some Emergency Shelter programs may only provide night time services, a bed might not be guaranteed each night for those who stayed the previous night. In addition, some Emergency Shelter programs because of capacity and hours may not participate in the CES and rather provide resources for individuals or families to get their assessment completed elsewhere.
2. **Interim Housing:** Safe, short-term program that provides basic services such as temporary housing, restrooms, meals, and services focused on supporting an individual or family access permanent housing as quickly as possible. Key distinctions are that individuals and families can stay there for a brief period of time and their bed is reserved from night to night. In addition, Interim Housing programs are full participants in CES and complete the CAT for those entering and the CAT scores drives the individual or families housing plan while in the program.
3. **Bridge Housing:** Safe, short-term program that provides basic services such as temporary housing, restrooms, meals, and services focused on supporting an individual or family access permanent housing as quickly as possible. Key distinctions are that Bridge Housing is specifically defined as a temporary housing program for individuals or families who have accepted and are enrolled in a permanent housing program (RRH or PSH) but have not yet moved into a permanent unit. In this situation they are only using the program as a safe place to stay while they await permanent housing placement. This is different than Emergency Shelter or Interim Housing in that individuals or families entering those programs may not be connected to a permanent housing resource yet. Bridge Housing can be implemented as a stand-alone program or as a process as a part of an Interim Housing program.

In addition to the definitions of the temporary housing interventions above, shelters providing temporary housing for Persons with Immediate safety needs (domestic violence or human trafficking) also fall into the category of emergency shelter/interim/bridge housing: Individuals and families with children who have an immediate need for shelter to escape domestic violence access housing and services through the network of care for domestic violence victims³³. When

³³ Access to resources at www.sandiego.networkofcare.org/dv . Retrieved March 23, 2017.

shelter beds are not available, participants may be assisted through temporary placement in local motels or referred to other community resources. Eligible participants may be single men, single women, youth, or adults with children who are experiencing intimate partner violence or human trafficking.

The following criteria and standards are for Emergency Shelter and Interim Housing programs. These programs are intended to provide short-term assistance, typically for up to 90 days.

Eligibility Criteria

Individuals and families must meet the HUD definition of Literally Homeless (Category 1), At Imminent Risk of Homelessness (Category 2), or Fleeing/Attempting to Flee Domestic Violence (Category 4).³⁴

Targeted Populations

- Individuals and families who meet the eligibility criteria.
- Who have low acuity and will be using ES/interim housing as a temporary place to stay while they self-resolve their homelessness; or
- Households who have been recommended for RRH but need a temporary place to stay while they are enrolled in a RRH program, permanent housing is identified and located, and are awaiting placement; or
- Households with mid-range to high acuity who, instead of accepting a permanent housing resource, have requested TH services but are awaiting placement; or
- Households with high acuity who have been recommended for PSH but need a temporary place to stay after they are matched with appropriate housing programs and while they wait for their PSH unit to become available.
- Individuals and families fleeing or attempting to flee a domestic violence situation. These individuals and families will specifically be referred to a domestic violence shelter and services.

Prioritization

- Follows CoC Priority Policy (See Appendix B: San Diego CoC Prioritization Policy)
- Follows CES Prioritization Guidelines (See Appendix C: CES Prioritization Guidelines)

Program Standards

Entry Criteria

³⁴ See definitions of homelessness in inset box on page 17.

In addition to the low barrier principles described in the community-wide standards section above, ES/interim housing operates a low barrier to shelter model that only uses the following criteria for entry for single adults:

- Ability to use the restroom on their own and not requiring hospital or nursing home care
- Agree to be nonviolent
- Agree not to sell drugs or use alcohol or illegal substances on the premises
- Agree to treat other participants, staff, and the property with respect
- Agree to obey fire and other safety regulations

The following criteria are not included as a requirement for shelter entry for single adults:

- Sobriety and/or commitment to be drug free
- Requirements to take medication if the participant has a mental illness
- Participation in religious services or activities
- Participation in drug treatment services (including Narcotics Anonymous/Alcoholics Anonymous)
- Proof of citizenship
- Identification
- Referral from the police, hospital, or other service provider (as opposed to self-referrals)
- Payment or ability to pay (no minimum rent)
- Absence of a criminal record

Emergency Shelter or, Bridge Housing provided to families or unaccompanied youth under 18 years of age should use the above criteria for single adults as a guide for their program entry criteria, recognizing that some specific items might be different for these populations especially when it comes to the safety of children.

Minimum Standards

- Each participant has his/her own bed with clean and appropriate linens and bedding.
- Participants have access to a safe and secure space that is designated for usage as a place to store their personal belongings.
- In facilities that are not single-sex, separate sleeping quarters and hygiene facilities are maintained for single male adults, single female adults, and families.
- If clothing is provided, it has been washed and sanitized prior to distribution.
- Personal hygiene products are made available to residents as needed.
- Length of stay is determined in written guidelines.
- Participants may expect a reasonable degree of privacy regarding information not protected by federal and state laws.
- Substantial efforts are made to locate permanent housing or longer-term housing and supportive services.
- Emergency preparedness policies are adopted with attention being given to the elderly

and disabled.

- Programs must create policies and procedures that provide a safe environment for shelter participants and staff; policies and procedures may vary depending on the population being served. These policies and procedures must be explained to applicants prior to moving into the shelter. In addition, they should be posted in the shelter and on the agency’s website.
- Programs do not require occupants to sign leases or occupancy agreements
- Supportive services are available to assist persons in obtaining permanent housing as quickly as possible. All residents are notified of the availability of support services and how to access the services and are encouraged to find permanent housing.
- Interim is meant to be available 24 hours a day, each day of the year. If it is necessary to temporarily close a shelter as much advance notice as possible must be given to the RTFH and participants. Unless closure is required due to unforeseen circumstances or safety, a minimum of 30 days’ notice is required. In any closure situation, efforts should be made to find a short-term replacement shelter or other accommodations to prevent participants from returning to the streets.
- Shelter participants will be treated by staff and volunteers with respect and dignity and will receive a welcoming, safe, and non-intimidating environment. Respectful treatment is evidenced by use of polite and non-aggressive language (by a respectful tone of voice, by no swearing by staff, no threats, assaults, etc.)
- Shelter staff and volunteers are provided with a clear anti-harassment and non-discrimination policy. The agency provides access to regular training on the policy at least annually.
- Shelter staff or others are encouraged to provide diversion counseling to aid new shelter applicants to find alternative housing to divert them from becoming homeless.
- Each shelter will have a policy of respect for each individual’s self-identified gender. Participants who request shelter services will be admitted to the shelter operated for the gender to which individuals identify themselves. Staff will not share or in any way reveal that certain participants may have identified themselves as transgendered/transsexual.
- Transgender and transsexual participants will be offered the same services and resources as all other participants as long as participant safety can be maintained. While shelter staff will take reasonable steps to accommodate specific needs, and it may not be possible to provide the specific accommodation requested, shelters would meet the federal Equal Access to Housing Standards.
- All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marital status identifying, as a family at a family shelter must be served as a family³⁵. Families at family shelters must not be separated when entering a shelter. There can be no inquiry, documentation requirement or “proof” related to family status, gender identification and/ or sexual orientation. The prohibition on inquiries or documentation

³⁵ HUD 24 CFR § 576.102 Prohibition against involuntary family separation; 24 CFR § 5.403 Definitions-Family; 24 CFR §570.3 Definitions – Household; 24 CFR 5.105(a) Nondiscrimination and equal opportunity)

excludes inquiries related to the purpose of determining safe placement in temporary emergency shelters that are limited to one sex, or for determining the number of bedrooms to which a household may be entitled. The age and/or gender of a child under 18 must not be used as a basis for denying any family's admission to a HUD-funded program.

- Shelters are encouraged to accommodate participant's pets if at all possible.
- There are no fees or rent charged to a shelter participant.
- Providers will outline in writing and verbally list their norms for appropriate behavior. Participants may be asked to leave only for behavior that is deemed seriously threatening or harmful to other participants and staff.
- The written policy for refusing to admit, asking a participant to leave or banning a shelter participant from reentering the program must be available and used only when all other options have been explored and the ban is necessary to protect the health and safety of staff and participants. Programs will document the behavior, any attempts to remedy the threat, and the efforts to secure more appropriate housing.
- All shelter participants will be notified of the agency's termination policy. When it is not possible to provide services because of the participant's behavior, efforts will be made by shelter staff to assist the guest in finding alternatives. Access to a shelter is not a privilege and is not taken away except under extreme circumstances. (See appeals and termination policies in agency-level standards).

Minimum Performance Benchmarks for Emergency Shelter

Performance thresholds for Emergency Shelter outcomes will be determined as aggregate data becomes available.³⁶

Bridge Housing

The Bridge Housing model is temporary housing used as a short-term stay when a participant has been offered and accepted a permanent housing intervention, but access to that permanent housing is still being arranged.

Eligibility Criteria

Individuals and families must meet the HUD definition of Literally Homeless (Category 1), At Imminent Risk of Homelessness (Category 2), or Fleeing/Attempting to Flee Domestic Violence (Category 4).

³⁶ In keeping with the principle of data-driven decision-making, the Standards will be updated after sufficient data has been collected.

Participants have been assessed by CES and matched to potential permanent housing programs.

Targeted Populations

- Individuals and families who meet the eligibility criteria.
- Participants using ES/interim housing as a temporary place to stay while they wait for their PSH or RRH unit to become available.

Prioritization

- Follows CoC Priority Policy (See Appendix B: San Diego CoC Prioritization Policy)
- Follows CES Prioritization Guidelines (See Appendix C: CES Prioritization Guidelines)

Standards

The operating standards for Bridge Housing mirror those set for interim housing except that the entrance criteria include having an existing PSH or RRH match.

Minimum Performance Benchmarks for Bridge Housing

Performance thresholds for Emergency Shelter outcomes will be determined as aggregate data becomes available.³⁷

Rapid Rehousing

Description

RRH is a Housing First intervention designed to help individuals and families quickly exit homelessness, return to housing in the community, and maintain long-term housing stability. The core components of RRH includes housing identification, move-in and rental assistance, housing stabilization, case management, and services designed to increase household incomes to fully assume the cost of rent at program termination.

The following outlines the principles for each of the core components for providing RRH services. These principles are from the RRH Performance Benchmarks and Program Standards published in February 2016 by the National Alliance to End Homelessness (NAEH):

Housing Identification

- Within the limits of the participant's income, a RRH program helps households access units that are desirable and sustainable—those that are in neighborhoods where they want to live, have access to transportation, are close to employment, and are safe.

³⁷ In keeping with the principle of data-driven decision-making, the Standards will be updated after sufficient data has been collected.

- Assistance includes accompanying the participant to potential housing locations as determined by case plan.
- Housing identification efforts are designed and implemented to actively recruit and retain landlords and housing managers willing to rent to program participants who may otherwise fail to pass typical tenant screening criteria.
- Critical to the formation of landlord-program relationship is the recognition of the landlord as a vital partner. The RRH provider must be responsive to landlords to preserve and develop those partnerships for future housing placement.

Rent and Move-In Assistance

- Rent and move-in assistance should be flexible and tailored to the varying and changing needs of a household while providing the assistance necessary for households to move immediately out of homelessness and to stabilize in permanent housing.
- A RRH program should make efforts to maximize the number of households it can serve by providing households with the financial assistance in a progressive manner, providing only the assistance necessary to stabilize in permanent housing.
- The level of rental assistance and participant contribution to rent is described in an individualized case plan but do not exceed the limits established in the ESG Policies and Guidelines adopted by the RTFH.
- Assistance may include rental subsidy and deposits, move-in assistance, or housing supports as allowed by the assistance-funding source.
- The initial term of rental assistance for RRH is limited to no more than six (6) months and may be renewed for a maximum of 18 months based on case plan and participant need. It is expected that most participants will need 12 months or less of subsidy.
- The level of participant contribution to rent should increase during the program term so that the participants are paying 100% of rent by time of termination.

Case Management and Services

- RRH case management should be participant-driven. Case managers should actively engage participants in voluntary case management and service participation by creating an environment in which the participant is driving the goal-setting based on what they want from the program and services, rather than on what the case manager decides they need to do to be successful.
- RRH case management should be flexible in intensity—offering only essential assistance until or unless the participant demonstrates the need for or requests additional help. The intensity and duration of case management is based on the needs of individual households and may lessen or increase over time.
- RRH Case management services will be offered a minimum of once per month.
- RRH Case management services should be available either in the participant residence or readily accessible office setting.

- RRH case management uses a strengths-based approach to empower clients. Case managers identify the inherent strengths of a person or family instead of diagnoses or deficits, and then build on those strengths to empower the household to succeed.
- RRH program case management reflects the short-term nature of the rapid rehousing assistance. It focuses on housing retention and helping a household build a support network outside of the program. It connects the participant with community resources and service options, such as legal services, health care, vocational assistance, transportation, child care, and other forms of assistance, that continue beyond

Eligibility Criteria

- Individuals and families must meet the HUD definition of literally homeless (Category 1), or fleeing Domestic Violence (Category 4).
- Households with income of 30% AMI or less is required for RRH assistance by ESG

Targeted Populations

- Individuals and families who meet the eligibility criteria; and
- Have mid-range acuity according to the Common Assessment Tool; or
- Households expected to regain housing independence in less than 18 months.

Priority Populations

- Follows RTFH Priority Policy (See Appendix B: RTFH Prioritization Policy)
- Follows CES Prioritization Guidelines (See Appendix C: CES Prioritization Guidelines)
- Refers to NAEH Model Priorities (See Appendix D: NAEH RRH Program Standards)
- Families coming from the streets or ES

Program Standards

The RTFH adopts the RRH program standards outlined in the RRH Performance Benchmarks and Program Standards published in February 2016 by the National Alliance to End Homelessness (NAEH). They include the core program components listed above and provide detailed standards for programs to operate by (see Appendix C.)

Determining Percentage of Rent Households Must Pay

The participant contribution to rent mirrors the ESG program guidelines. The goal of RRH is to have the household contributing to 100% of the rent at the time of termination of rental assistance. With this goal, the maximum amount of rent that a participant will pay will be up to 100% of the rental amount. Programs providing RRH assistance will use a progressive engagement model that will start with the household contributing at least 30% of their income to rent if receiving income. This will steadily increase in incremental monthly steps over the course of the program with the household ultimately paying 100% of the rent and program termination. 100% of the cost of rent in rental assistance may be provided to program participants at initial program entry; however, to maximize the number of households that can be served with RRH services, it is expected that the level of subsidy will be based

on the goal of providing only what is necessary for each household to be stably housed for the long term. RRH case managers should work with participants receiving assistance to develop a plan whereby rental subsidies will decrease as the participant prepares to become self-sufficient from the rental assistance. Rental assistance can only be provided for a unit that meets funding source criteria.

*Minimum Performance Benchmarks for RRH Projects*³⁸

- 69% of households will exit to permanent destinations
- 85% of households will not return to homelessness in the following 12 months
- 84% of households will maintain or increase income
- 50% of households served will move into housing within 45 days of RRH referral to agency
- The remaining 50% of households served will move into housing within 90 days of RRH referral to the agency

Transitional Housing

TH is a time-limited (up to 24 months) residential facility (congregate-site or scattered-site) paired with supportive services targeted to individuals and families to help them address barriers such as domestic violence, substance use, mental illness, lack of sufficient income, or legal issues prior to entering permanent housing. TH is used when permanent housing resources (RRH and PSH) are not available or the participant is choosing TH over RRH and PSH. Although TH can be up to 24 months in duration, it is recommended that programs only provide housing and services for what is essential for the person to move to stable permanent housing and to limit the program residence to substantially less than 12 months on average. Program designs work to reduce the length of time in homelessness, TH or temporary housing and enhance housing stability by providing aftercare or follow-up support services.

Eligibility Criteria

- Individuals and families must meet the HUD definition of homeless (Category 1, 2 or 4).

Target Populations

The CoC will target populations for TH identified as ‘best practices’:

- Individuals and families who meet the eligibility criteria and
- Who have mid-range acuity according to the VI-SPDAT, and are

³⁸ Performance thresholds for permanent housing (RRH and PSH) reflect data from the System Framework reports for all projects in the HMIS for the FY2015 federal fiscal year and the midpoint performance data for HUD CoC-funded projects as established in the 2016 Scoring process.

- Unaccompanied youth age 17 and younger, or
- Transition age youth ages 18-24, especially those aging out of the foster care system, or
- Individuals and families fleeing domestic violence, or
- Individuals and families interested in substance abuse treatment
- People who are re-entering the community following a period of incarceration of less than 90 days

Priority Populations

- Follows CoC Priority Policy (See Appendix B: San Diego CoC Prioritization Policy); and
- Follows CES Prioritization Guidelines (See Appendix C: CES Prioritization Guidelines)

Program Standards

1. All households are required to have a signed lease or occupancy agreement upon program entry.
2. The program explains the services that are available and the behavioral requirements for participation. It secures a commitment from each adult household member to adhere to the occupancy agreement and behavioral standards prior to admitting the individual or family into the program.
3. The program can only require disability-related services if the participant has voluntarily committed to services, or if the program is a licensed treatment facility.
4. Individualized case management is available at minimum of every week to each household who are admitted into the program.
5. The program assists participants in accessing appropriate support services, such as basic life skills information, counseling, and training, including budgeting, money management, use of credit, housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security card, birth certificate).
6. Educational advancement, such as GED preparation and attainment, post-secondary training (college, technical school, military, etc.), and vocational education will be provided or will be coordinated through external referrals.
7. Job preparation and attainment, such as career counseling, job preparation-training, dress and grooming, job placement and job maintenance will be provided or will be coordinated through external referrals.
8. Behavioral health care, such as substance use counseling (individual and group), education, prevention and referral services, and mental health counseling will be provided or will be coordinated through external referrals.
9. Assistance in accessing mainstream benefits, including food stamps, childcare assistance, and health insurance, must be provided.

Minimum Performance Benchmarks for TH Projects³⁹

- 64% or more of all participants will exit to permanent housing
- 64% of participants will access mainstream resources (i.e. Cal-Fresh, Medi-Cal)⁴⁰
- 68% of participants will maintain or increase income from benefits, or employment or a combination of both
- 38% of participants will exit with employment

Permanent Supportive Housing

PSH is community-based housing with indefinite leasing or rental assistance paired with supportive services to help people with disabilities that are experiencing homelessness, especially chronic homelessness, achieve housing stability, live independently, and improve their overall quality of life.

Eligibility Criteria

- Participants must meet the HUD definition of homeless (Category 1, 2, or 4) and have a professionally diagnosed disability.

A person with disabilities means a household composed of one or more persons at least one of whom is an adult who has a disability. For HUD purposes, the disability must be confirmed by professional who is licensed to make that type of diagnosis. A detailed description is found in Appendix F.

Program Prioritization Requirements

- Follow CoC Priority Policy (See Appendix B: San Diego CoC Prioritization Policy)
- Follows CES Prioritization Guidelines (See Appendix C: CES Prioritization Guidelines)
- Priority must be given to chronic homeless households when vacancies occur

Targeted Populations

³⁹ Minimum performance standards for TH were established based on documented averages of CoC project outcomes, and funding source standards. Projects receiving funding with other performance outcome thresholds are expected to meet the higher standard. ³⁹ Data from the System Framework reports for all projects in the HMIS for the FY2015 federal fiscal year and the midpoint performance data for HUD CoC-funded projects as established in the 2016 Scoring process

⁴⁰ The measure of access to resources includes any resources received while the participant is housed in the program, including resources which the participant was receiving at the time of entry.

- Individuals and families who meet the eligibility criteria; and
- Priority is given to Individuals and families who meet HUD's definition of Chronically Homeless; and
- Have the longest term in homelessness, and
- Have high needs with multiple barriers to housing; including individuals serious mental illness or substance use disorder, and / or
- Individuals or families identified as frequent users of high-cost systems through administrative data sources, including health care or criminal justice systems.

Program Standards

1. Promotes participant self-determination in selection of housing.
2. Use of assertive outreach/engagement strategies and housing stabilization case management with the understanding that participation in supportive services is not required.
3. Provides services that will promote the household increasing income levels, including employment as well as assisting the household apply for permanent disability benefits. Individualized budgeting and money management services are provided to program participants as needed.
4. Provides access to full-service wrap around services, including representative payee if needed.
5. Provides basic life skills information including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and information for obtaining vital documents (Social Security card, birth certificate, etc.).
6. Provides access to employment and educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education may be provided.
7. Promotes sobriety by utilizing a Harm Reduction approach to drug and alcohol treatment to help the participant with making decisions that lessen the negative impact of their drug and alcohol use on their housing stability, health, and general well-being.
8. Connects participants to community-based and mainstream resources, especially enrollment in a health care home to receive primary care services.
9. Participant contributions to housing costs do not exceed established local rent reasonableness or maximum allowed by funding source.
10. Households are expected to contribute 30% of the household's monthly-adjusted gross income to rent, if they have income. There is no minimum rent for households without income.
11. Provides tenant education and housing stability services or access to services by referral or through mainstream resources. Provides individualized case management to program participants on a regular and consistent basis as determined by the individual's needs and goals. Case management services should be available either in the participant residence or readily accessible office setting.
12. Case management includes the following:

- Comprehensively assessing the individual’s needs and creating an individualized care coordination plan; working with the person to access services and supports in accordance with their care coordination plan, and reassessing the person’s needs over time to adjust the care coordination plan and link them with ongoing services and supports to help them meet their goals.
- Helping participants learn to live in housing, maintain their housing in a safe manner, get along with fellow tenants and the landlord.
- Helping participants create support systems and participate in the community as they desire.
- Assisting participants in accessing necessary furniture or household items to meet habitability needs.
- Provides reevaluation of participant need at least annually.
- Assisting participants to find other appropriate permanent housing if they are no longer eligible for PSH.

Minimum Performance Benchmarks for PSH Projects⁴¹

- 85% of participants will remain permanently housed for 12 months
- 44% of participants who exit PSH programs within 90 days will re-enter PSH as a priority
- 32% of participants without a source of reportable income at program entry will obtain cash benefits within one year
- 58% of participants without a source of reportable income at program entry will obtain non-cash benefits within one year

⁴¹ Performance benchmarks for RRH, TH and PSH reflect data from the System Framework reports for all projects in the HMIS for the FY2015 federal fiscal year and the midpoint performance data for HUD CoC-funded projects as established in the 2016 Scoring process.

Appendix A. HUD Homeless Definition Categories

The following Homeless Definition Categories can be found in the HUD Federal Register Volume 76, No. 233, dated Monday, December 5, 2011, under Rules and Regulations.

Category 1: Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, if:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Category 3: Homeless under other Federal Statutes⁴²

Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:

1. Are defined as homeless under the other listed federal statutes;
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
3. Have experienced persistent instability as measured by two moves or more in the preceding 60 days; and
4. Can be expected to continue in such status for an extended period due to special needs or barriers.

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

- 1 Is fleeing, or is attempting to flee, domestic violence;
- 2 Has no other residence; and
- 3 Lacks the resources or support networks to obtain other permanent housing.

⁴² Note: CoCs must have written permission from HUD to utilize CoC or ESG funds for Category 3. HUD as not given permission to use the Category 3 definition.

Appendix B. San Diego CoC Prioritization Policy

The CoC Board adopted policy priorities which incorporate Community Planning and Development (CPD) bulletin #14-012: *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in PSH*, issued July 28, 2014. The priorities were updated in 2016 to mirror CPD #16-11* and further define 'most needs' to include persons with serious mental illness or substance use disorder*

Board action establishes the following population priorities for the San Diego CoC:

Service Entry Priorities (Prioritization of Participants)

1. Chronically homeless individuals, youth and families:
 - a. Those with the longest history of experiencing homelessness and the most needs
 - b. Those with the longest history of experiencing homelessness
 - c. Those with the most needs, particularly mental illness or substance use disorder
 - d. All other: Non-Chronically homeless individuals, youth and families

- Note

CPD 16-11 for non- dedicated CH housing includes:

- (a) Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs
- (b) Homeless Individuals and Families with a Disability with Severe Service Needs.
- (c) Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs
- (d) Homeless Individuals and Families with a Disability Coming from Transitional Housing.

Appendix C. CES Prioritization Guidelines

Documentation of Priority Status

	Priority	Homeless Category	Length of Stay in Homelessness	Where Experienced Homelessness	Documented Disability	Severity of Service Needs
Permanent Supportive Housing	1	Category 1 - Homeless Individual or Family	> 12 months continuous OR Total of at least 4 episodes totaling >12 months in 3 years	Unsheltered, Emergency Shelter, Safe Haven	Yes	High = VI-SPDAT 2 score of 8 or higher for singles and 9 or higher for families AND/OR Documented frequent user of health or criminal justice systems through data source
	2	Category 1 - Homeless Individual or Family	> 12 months continuous OR Total of at least 4 episodes totaling >12 months in 3 years	Unsheltered, Emergency Shelter, Safe Haven	Required	Low = VI-SPDAT Score of less than 8 for individuals and less than 9 for families
	3	Category 1 - Homeless Individual or Family	Total of at least 4 episodes total <12 months in 3 years	Unsheltered, Emergency Shelter, Safe Haven	Required	High = VI-SPDAT 2 score of 8 or higher for singles and 9 or higher for families AND/OR Documented frequent user of health or criminal justice systems through data source
	4	Category 1 - Homeless Individual or Family	Total of at least 4 episodes total <12 months in 3 years	Unsheltered, Emergency Shelter, Safe Haven	Required	Low = VI-SPDAT Score of less than 8 for individuals and less than 9 for families

Transitional Housing	1	Category 1 or 4 Family and one of CoC TH target	Length of Stay > 14 days	Unsheltered, Emergency Shelter, Safe Haven	Not required	Mid= VI-SPDAT Score between 4-8 of for individuals and between 4-9 for families who have chosen TH over PH resource
	2	Category 1 or 4 Individual and one of CoC TH	Length of Stay > 14 days	Unsheltered, Emergency Shelter, Safe Haven	Not required	Mid = VI-SPDAT Score between 4-8 of for individuals and between 4-9 for families who have chosen TH over PH resource
Rapid Re-Housing	1	Category 1 or 4 Family	Length of Stay > 14 days	Unsheltered, Emergency Shelter, Safe Haven	Not required	Mid = VI-SPDAT Score between 4-8 of for individuals and between 4-9 for families
	2	Category 1 or Individual	Length of Stay > 14 days	Unsheltered, Emergency Shelter, Safe Haven	Not required	Mid = VI-SPDAT Score between 4-8 of for individuals and between 4-9 for families
Emergency Shelter Interim Housing	1	Category 1, 2, 3, or 4 Family	Any Length of Stay	Any	Not required	Low = VI-SPDAT Score 3 or less for individuals and families or awaiting placement in PSH, TH, or RRH
	2	Category 1, 2, 3, or 4 Individual	Any Length of Stay	Any	Not required	Low = VI-SPDAT Score 3 or less for individuals and families or awaiting placement in PSH, TH, or RRH

Homeless Prevention	NA	Category 2 Individual or Family	Primary nighttime residence will be lost within 14 days	Meet Category 2	Not required	Past episode of homelessness within the last 12 months
	NA	Category 2 Individual or Family	Primary nighttime residence will be lost within 14 days	Meet Category 2	Not required	Past episode of homelessness
	NA	Category 2 Individual or Family	Meet Category 2	Meet Category 2	Not required	No prior homeless episodes

Appendix D. NAEH RRH Program Standards

The following program standards are from the Core Component Program Standards section in the RRH Performance Benchmarks and Program Standards published in February 2016 by the National Alliance to End Homelessness (NAEH).

Housing Identification Program Standards

Program Staffing

- Program designates staff whose responsibility is to identify and recruit landlords and encourages them to rent to homeless households served by the program. Staff has the knowledge, skills, and agency resources to understand landlord's perspectives, understand landlord and tenant rights and responsibilities, and negotiate landlord support. A program may have dedicated staff for which this is the primary responsibility. If a program does not have a dedicated staff person(s) who performs this function, case manager job descriptions must include responsibilities including landlord recruitment and negotiation and at least some of the program's case managers must be trained in this specialized skill set to perform the recruitment function effectively.
- Staff is trained on housing identification, landlord tenant rights and responsibilities, and other core competencies as well as the wider array of housing assistance available within a community. Program has routine ways to onboard new staff and to keep staff regularly updated on new strategies, policies, and housing assistance options in the community.

Program Policies

- Program has written policies and procedures for landlord recruitment activities, including screening out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices.
- Program offers a standard, basic level of support to all landlords who lease to program participants. This support is detailed in a written policy distributed to landlords. Program can negotiate additional supports, as needed, on a case-by-case basis. At a minimum, this policy specifies that program staff:
 - Respond quickly (within one business day) to landlord calls about serious tenancy problems;
 - Seek to resolving conflicts around lease requirements, complaints by other tenants, and timely rent payments; and
 - Whenever possible, negotiate move-out terms and assist the person/household to quickly locate and move into another unit without an eviction
- Program has a detailed policy for the type of assistance provided to help households find and secure housing. Staff explains and distributes this policy to households at entry to the program. Some households may decline assistance in finding housing, but the program checks on their progress and offers advice and/or direct assistance if they encounter obstacles they cannot resolve independently.
- Program has a written policy requiring staff to explain to participant's basic landlord-tenant rights and responsibilities and the requirements of their specific lease.

Program Activities

- Program continually engages in the recruitment and retention of landlord partners and has methods of tracking landlord partners and unit vacancies, unit locations, characteristics, and costs.
- Program provides participants with multiple housing choices within practical constraints. The onus is on the program to provide these housing choices, but this does not preclude program participants from conducting their own search and choosing housing they identify independently.
- Program assists participants in making an informed housing choice with the goal that the participant will be able to maintain after program exit, even when the household will experience high housing cost burden. While, participants ultimately chose their housing unit, a program uses housing and budgeting plans that help a participant understand the likelihood of being able to pay rent and meet the requirements of the lease by the end of assistance. For extremely low income households, there should be reasonable projections and expectations and due diligence on the program's part to help participants secure income (through employment, public benefits, and/or on-going rental assistance) at program exit
- When closing a case, program provides information to landlords about how they can contact the program again if needed and what kind of follow-up assistance may be available.

Rent and Move-In Assistance

Program Staffing

- Program staff are trained on regulatory requirements of all RRH funding streams and on the ethical use and application of a program's financial assistance policies, including, but not limited to initial and ongoing eligibility criteria, program requirements, and assistance maximums. Program has a routine way to onboard new staff and to keep staff regularly updated on changing regulations and/or program policies.

Program Policies

- Program has clearly defined policies and procedures for determining the amount of financial assistance provided to a participant, as well as defined and objective standards for when case management and financial assistance should continue and end. Guidelines are flexible enough to respond to the varied and changing needs of program participants, including participants with zero income.
- If participants are expected to pay an amount toward their housing, program has written policy and procedures for determining that amount, and it must be an amount that is reasonable for their income (this could be up to 50-60 percent of income), including \$0 for those with no current income.
- A progressive approach is used to determine the duration and amount of rent assistance. Financial assistance is not a standard "package" and is flexible enough to adjust to households' unique needs and resources, especially as participants' financial circumstances or housing costs change. Policies detailing this progressive approach include clear and fair decision guidelines and processes for reassessment for the continuation and amount of financial assistance. Policies and procedures also detail when and how RRH assistance is used as a bridge to a permanent subsidy or PSH placement.

Program Activities

- Program provides when needed—either directly or through formal agreement with another organization or agency—financial assistance for housing costs, which may include rental deposits, first month’s rent, last month’s rent, temporary rental assistance, and/or utility assistance.
- Program issues checks quickly and on time and has the capacity to track payments to landlords and other vendors.
- Program has the capacity to pay reasonable back rent and utility arrears that directly prevent a participant from being able to sign a lease.
- Program helps participants meet basic needs at move-in, such as securing basic furnishings for an apartment, including mattresses and basic kitchen items such as a pot for cooking and utensils.
- The transition off financial assistance is coordinated with case management efforts to assist program participants to assume and sustain their housing costs

RRH Case Management and Services

Program Standards

Program Staffing

- Case manager’s job descriptions direct case managers to focus on housing and to use strengths- based practices focused on participant engagement and meeting the unique needs of each household.
- In programs that have specialized staff that conduct housing location case manager’s work closely with housing locator staff to match the participant to an appropriate unit as quickly as possible.
- Case managers are trained on RRH case management strategies and related evidence-based practices as well as program policies and community resources. Additionally, a program has a regular process for onboarding new staff and regularly updating the training of current staff.

Program Policies

- Except where dictated by the funder, program participants direct when, where, and how often case management meetings occur. Meetings occur in a participant’s home and/or in a location of the participant’s choosing whenever possible.
- Case managers respect a program participant’s home as their own, scheduling appointments ahead of time, only entering when invited in, and respecting the program participant's personal property and wishes while in their home.
- When case management and service compliance is not mandated by federal or state regulation, services offered by a program have voluntary participation.
- Program has clear safety procedures for home visits that staff is trained on and that are posted clearly visible in office space and shared with program participants at intake, and shared with participants and staff whenever changes are made.
- Program has clearly defined relationships with employment and income programs that it can connect program participants to when appropriate.
- Program has clearly defined policies and objective standards for when case management should continue and end. These guidelines are flexible enough to respond to the varied

and changing needs of program participants. In instances where cases are continued outside of these defined policies and objective standards, there is a review and approval process.

Program Activities

Program activities for RRH case management are grouped into categories that will contribute to the specific goals of RRH case management. The program activities listed here are not exclusively provided in a linear progression and can be administered in whatever order and intensity is most appropriate for a participant.

Obtain and Move into Permanent Housing

- At enrollment or within 72 hours of enrollment, program conducts a tenancy barriers assessment— not for screening out a participant, but to quickly address any such barriers, help direct and navigate the housing search and contribute to landlord negotiation efforts. Any other assessments completed prior to housing are limited and focus on those things necessary to support health and safety and resolve the housing crisis as quickly as possible.
- Program has resources and/or can connect participants to community resources that help participants: resolve or navigate tenant problems (like rental and utility arrears or multiple evictions) that landlords may screen for on rental applications; obtain necessary documentation such as identification; prepare participants for successful tenancy by reviewing lease provisions; and support other move-in activities such as providing furniture.
- Program offers basic tenancy skills learning opportunities which can include instruction or guidance on basic landlord-tenant rights and responsibilities, requirements and prohibitions of a lease, and meeting minimum expectations for care of the housing unit, such as not causing damage

Support Stabilization in Housing

- Program staff works directly with the participant and landlord to resolve tenancy issues without threatening the participant's tenancy. The issue might be failure to pay rent, not properly maintaining the unit, or disturbing the quiet enjoyment of others. It also may include a landlord not meeting his/her obligations. Program works quickly to identify a corrective course of action, and, without breaking a participant's confidentiality, keep the landlord and participant informed about the program's action to mitigate the situation.
- When appropriate, case managers work with participants to build their communication skills to better respond to or negotiate with a landlord. This might relate to repairs; an extension on a rent payment; or complaints against the tenant concerning noise, odors, trash, or the behavior of children or participants, for example.
- When necessary, case managers help participants avoid evictions before they happen, and maintain a positive relationship with the landlord. This can be done by moving a household into a different unit prior to eviction and possibly identifying a new tenant household for the landlord's unit.

- Housing plans, sometimes known as case plans or goal plans, focus on how program participants can maintain a lease and address barriers to housing retention, including maximizing their ability to pay rent; improving understanding of landlord/tenant rights and responsibilities; and addressing other issues that have, in the past, resulted in housing crisis or housing loss. Plans account for participant preferences/choices, and include only goals created with and agreed to by the participant.
- Program, at a minimum, maintains a list of community resources (and their eligibility requirements) to which participants can be referred. Preferably, program has relationships with these agencies. The list is regularly updated, and includes other low-income housing assistance programs.
- Case managers make referrals to appropriate community and mainstream resources, including, but not limited to income supplements/benefits (TANF, Food Stamps/SNAP, etc.), non-cash supports (healthcare, food supports, etc.), legal assistance, credit counseling, and subsidized childcare. When making these referrals, it is the case manager's responsibility to follow-up on receipt of assistance. However, a participant may choose not to follow up on or participate in any referred services or programs.
- As RRH assistance is short-term, case managers pay attention to participants' incomes moving forward. Though income is not a requirement at the beginning of a program, case manager's help participants review their budgets, including income and spending, to make decisions about reducing expenses and increasing income. Options include benefit enrollment and increasing employment and earnings over time.
- Case manager's work with participants to identify pathways for increasing earned income; including participating in mainstream and community employment support programs as well as using a program's own employer connections.
- If necessary, participants are assisted in identifying existing familial and personal connections that can help them maintain housing by providing supports such as child care, transportation, etc. Participants may choose not to engage in this process.

Close the Case

- When closing a case, case managers are responsible for ensuring that all appropriate referrals have been made and information on available community assistance has been shared with a participant.
- When a referral to on-going supports is made while a case is open or in the process of closing, case managers provide a "warm handoff" and follow up, to assure that assistance is satisfactory.

When closing a case, case managers provide information to participants about how they can access assistance from the program again if needed and what kind of follow-up assistance may be available. In instances when a participant is at imminent risk of returning to homelessness, program has the capacity to either directly intervene or provide referral to another prevention resource.

Appendix E. Definition of Chronically Homeless

24 CFR §578.3 HUD Chronically Homeless Definition

A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, if the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, if the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility.
- An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all the criteria in paragraph (1) of this definition, before entering that facility; or
- A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Appendix F. Definition of Disability

Person with disabilities means a household composed of one or more persons at least one of whom is an adult who has a disability.

- (1) A person shall be considered to have a disability if he or she has a disability that:
 - (i) Is expected to be long-continuing or of indefinite duration;
 - (ii) Substantially impedes the individual's ability to live independently;
 - (iii) Could be improved by the provision of more suitable housing conditions; and
 - (iv) Is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.
- (2) A person will also be considered to have a disability if he or she has a developmental disability, as defined in this section.
- (3) A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).
- (4) Notwithstanding the preceding provisions of this definition, the term person with disabilities includes, except in the case of the SRO component, two or more persons with disabilities living together, one or more such persons living with another person who is determined to be important to their care or well-being, and the surviving member or members of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death. (In any event, with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.)

https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

Appendix G. List of Acronyms

CAT – Common Assessment Tool
CES – Coordinated Entry system
CoC – Continuum of Care
CoC Program – Continuum of Care Competitive Program- funded by HUD
ES – Emergency Shelter
ESG – Emergency Solutions Grant – direct entitlements funded by HUD
ESG – State – ESG funds awarded to California Department of Housing and Community Development for use in non-entitlement areas
HMIS – Homeless Management Information System
HUD – U.S. Department of Housing and Urban Development
PSH – Permanent Supportive Housing
RRH – Rapid Re-housing
TH – Transitional Housing
VA – Department of Veterans Affairs
VI-SPDAT – Vulnerability Index-Service Prioritization Decision Assistance Tool
VI-F-SPDAT – Vulnerability Index-Family Service Prioritization Decision Assistance Tool

Appendix H. References and Websites Additional Information

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The 2017 RTFH Standards were developed with the assistance:



FERMANIAN BUSINESS &
ECONOMIC INSTITUTE

This is a working draft ETP under VAWA.
The final ETP will include detailed
protocols to implement the safety policy.

Approved by the RTFH Governance Board
January 2018

Emergency Transfer Plan

**For the Regional Task Force
on the Homeless, San Diego
City and County CoC**

Evaluations Advisory Committee

EMERGENCY TRANSFER PLAN

Context

The Regional Task Force on the Homeless, Inc. (RTFH) is concerned about the safety of tenants assisted through the Continuum of Care. In accordance with the Violence Against Women Act (VAWA), housing providers within the CoC allow tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request emergency transfer of assistance between housing units when there is imminent risk of harm.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that the Regional Task Force on the Homeless is in compliance with VAWA.

Purpose

Provide for the safety of tenants facing imminent risk of harm.

Policy Statement

Promote the safety of tenants in CoC-supported housing by establishing policy and protocols for transferring housing relocation for tenants who are at imminent risk of harm if they remain in their current housing unit.

Requests for emergency transfer are available regardless of sex, gender identity, or sexual orientation. The ability of provider to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether provider has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

Components of Policy

Definitions

For purposes of this policy, the following definitions apply¹:

CoC-supported housing: as described in VAWA 2013², public housing programs, tenant-based, project-based Section 8, housing and rental assistance provided under the Continuum of Care and Emergency Solutions Grants programs, Multi-Family Housing, Housing Opportunities for Persons with AIDS, and HOME.

Covered unit: a unit where rental assistance or subsidy is provided by HUD CoC funding (includes TBRA).

External transfer: emergency relocation of a tenant to another unit here the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new

¹ adopted from VAWA Emergency Transfer Plan Sect. 5. 2005; HUD Interim Rule 2012; and RTFH Written Standards 2017.

² 24 CFR Parts 5, 91, 92, 93, 200, 247, 574, 576, 578, 880, 882, 883, 884, 886, 891, 905, 960, 966, 982, and 983

unit.

Immediate Transfer: transfer of household to another housing location, preferably within 48 hours, which may be extended up to 30 days

Internal transfer: emergency relocation of a tenant to another unit where the tenant may reside in the new unit without having to undergo an application process.

Interjurisdictional transfer: relocation to another CoC geographic area or requiring housing assistance transfer to another housing authority catchment area.

Reasonable belief: standard of awareness in which facts, circumstances, or experiences can be articulated that would result in similar caution by an ordinary person

Safe unit: housing within a designated ‘safe house’ or location that the victim of domestic violence, dating violence, sexual assault, or stalking believes does not pose imminent risk.

Tenant: any individual or household receiving HUD housing assistance or legally residing in housing from the programs covered by this policy,

Eligibility

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD’s regulations³ is eligible for an emergency transfer, if: The tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

General Qualifications

To qualify for emergency transfer:

The tenant must expressly request the transfer; and

The tenant must reasonably believe there is a threat of imminent harm from further violence if they remain within the same dwelling unit that they are currently occupying; or

In the case of a tenant who is a victim of sexual assault, either they reasonably believe there is a threat of imminent harm from further violence if they remain in the same dwelling unit they are currently occupying, or they experienced sexual assault on the premises during the previous 90-calendar-day period⁴.

Confidentiality

Federal and California State Laws protect victims of violence. State statutes include civil codes, family and welfare and institutions codes, labor and employment codes, and penal codes. In general, disclosure of identifying information or of the location of residences for domestic violence to unauthorized persons is prohibited by law and subject to serious penalties.

³ as described in 24 CFR part 5, subpart L

⁴ California Civil code extends this period to 180 days for early termination of lease agreements.

Under HUD regulations, domestic violence programs are restricted from entering personally identifying information about victims into the HMIS system. Data regarding client services pertinent for system performance reporting may be provided using entry into a comparable data base.

All persons assisting with the emergency transfer (including a non-CoC housing provider) will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This specifically includes keeping confidential the new location of the dwelling unit of the tenant from public disclosure or to the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. The Notice of Occupancy Rights under the Violence Against Women Act for all tenants provides more information about the responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Documentation

Tenant Transfer Request

Requests for emergency transfer are submitted to the housing agency or assistance responsible for housing placement. Requests for transfer will be documented in writing, either by the tenant or the responsible housing agency.

The tenant's submission of a written request to the covered housing provider, where the tenant self-certifies that they meet the criteria in the general qualifications section of this policy, is sufficient documentation to meet the VAWA requirements. The responsible agency will provide reasonable accommodations to this policy for individuals with disabilities, persons needing language translation, and those at immediate risk whose safety may be compromised by a delay in order to complete a written request.

Verification of Risk

A covered housing provider may ask an individual seeking an emergency transfer to document the occurrence of violence that qualifies for implementation of the Emergency Transfer Plan. Documentation may include:

A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the program.

A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

When the emergency transfer includes early termination of a lease for a unit in the general housing market, additional documentation may be required, such as a copy of temporary restraining order or protective order, copy of a report to law enforcement, or documentation from a qualified third party⁵

Under VAWA, no other documentation is required to initiate the transfer process. Other information may be subsequently needed to facilitate implementation of the transfer.

Reasonable Effort to Seek Alternate Unit

The housing provider and CoC Coordinated Entry System staff will take every reasonable effort to locate

⁵ California Civil code identifies qualified third parties such as physicians, psychologist, licensed clinical social workers, or domestic violence or sexual assault counselors.

alternate safe housing for tenants requesting emergency transfer. Housing comparable to that being vacated and which is acceptable to the tenant is preferred, however, an alternate form of housing that is safe may be offered as an immediate, temporary response. Efforts to identify alternate housing and client acceptance or refusal of the housing offered will be documented in a tenant record maintained by the agency receiving the request for transfer.

Transparency

The RTFH will provide a copy of this policy available to the housing providers covered by this policy. Providers will make the Emergency Transfer Plan available to tenants upon request. Information about the ETP, limited to the extent that it protects system safety, will be made publicly available on the RTFHSD website.

System-level Reporting

The RTFH system provider will maintain records of transfer requests, and outcomes of such requests for a period of three years from the initial request, or for a longer period as specified in regulations for the program(s) providing funding or other resources supporting tenant assistance.

When an Emergency Transfer results in moving the tenant(s) to a temporary housing location or institutional setting that is necessary to protect the safety of the client household, the RTFH project performance evaluation process will not penalize the program for a ‘non-permanent housing’ outcome. Local procedures will adjust program outcome data to neutralize the potential impact of what may otherwise be assessed as a negative outcome. Emergency Transfers that result in successful placement in permanent housing will be credited to the agency initiating the transfer.

Relationship to Other Policies

California Civil Code

California Civil Code (1946.7) allows survivors of domestic violence, sexual assault, human trafficking, stalking, elder abuse, and dependent adult abuse to end their housing leases. This law empowers survivors to leave abusive situations while avoiding the usual penalties associated with breaking a lease. Personnel involved in implementing emergency transfer for tenants of HUD housing assistance will comply with this code.

Case managers and housing navigators will assist HUD- assisted households in early termination of a lease when necessary by (1) advising tenant of their rights and offering written information, such as a copy of the National Housing Law Project brochure⁶ and (2) informing landlords of this Civil code.

Child Welfare Services

In cases where the tenant household is involved with Child Welfare Services (CWS), household must comply with existing court orders. In cases of risk, the parent/Agency can request a modification of existing court orders to allow the children to move out of the county/country with the parent. It is reasonable to expect that process would take, on average, 48 to 72 hours. It might take less time if, for example, all the parties to the dependency case agree and an Emergency Ex Parte Request can be submitted to the juvenile court that same day

⁶ Brochures are available in English and Spanish as part of the National Housing Law Project Early Termination Toolkit.

during business hours. It could, however, take considerably more time if, for example, the parties do not agree and a contested hearing/trial is required.

The juvenile court may authorize the parent to go to another county with the children on an emergency/temporary visit basis while the court orders about a longer-term move are being addressed. Authorization to leave the U.S. would be problematic since that could affect the juvenile court's jurisdiction and the other parent's ability to obtain custody/visitation rights. The custodial parent would need to ask to modify the court orders (with their attorney and the Agency's assistance) on an emergency basis in the juvenile court. The ETP will expect that CWS-involved households may need interim temporary safety arrangements within the CoC (San Diego County) for at least 48-72 hours but up to 60 days while the matter is being addressed in juvenile court.

Coordinated Entry System (CES)

The RTFH will provide a coordinated system to assure secure emergency transfers. The system will comply with federal and state mandates for protection of victims of violence. Coordination by the RTFH will work with the existing safe shelter system to enhance the capacity of the CoC to respond to the needs of victims of violence. The system design will ensure confidentiality of identifying personal information in accordance with federal and state law, and health-related information protected by the Health Insurance Portability and Accountability Act (HIPAA).

Prioritization and Housing Waiting Lists

Emergency transfer requests are initiated in response to physical harm, as such, this policy takes lethality into consideration. Priority is given in transfer to an available comparable housing resource. For example, priority is given when a transfer from an occupied unit or bed can be made available in exchange for the unit or bed the ETP client will occupy. Retaining tenant safety for all persons immediately impacted by the exchange will be given consideration in prioritizing the use of resources.

Waiting list priority will be given only to the extent necessary to facilitate transfer between housing units of the same housing type and to the extent that it does not violate Fair Housing regulations. This type of transfer results in creating a vacancy that can be made available to the first qualifying person or household on the waiting list. As a result, the order of the waiting list is preserved.

Office of the Public Defender / Law Enforcement

Some cases of violence may require involvement of the Office of the Public Defender or other law enforcement agencies such as the Drug Enforcement Agency. In these cases, the responsible housing agency will assist the tenant in connecting with these external organizations. Information about the case continues to be governed by the terms and conditions described under confidentiality.

Termination of Assistance

Reasons for Termination of Assistance or Eviction from Occupancy

Under the ETP, the conditions for termination of housing assistance or eviction from occupancy remain consistent with existing policies for any recipient, such as failure to pay rent. These policies consider the safety of tenants but do not permit the removal of assistance based on the mere fact of being a victim of violence.

Determination of Household Assistance

When households separate as the result of violence, members of the household identified as victims of violence

are offered assistance under the ETP policy. When circumstances include mutual combatants, where both parties may be considered victims, housing for each of the victims is offered in accordance with the ETP policies. In cases where one component of the separated household needs to establish eligibility, VAWA cites that a period of 90 days to establish eligibility for a program or find new housing is generally reasonable.

Limitations and Disclaimers

Nothing in this policy may be construed to supersede any eligibility or other occupancy requirements that may apply under a covered housing program.

Housing provider is not liable for protection of tenants (damages, injury, harm) resulting from tenant refusal of safe housing; or from actions of individuals not under the direct control of the provider. The responsibilities of agency and housing provider personnel do not extend beyond the ordinary protections of clients as mandated by law. (i.e. no liability beyond that of an ordinary citizen is assumed as the result providing assistance to the household.)

Plan Implementation Protocols

Implementation of the RTFH Emergency Transfer Plan (ETP) has the following features:

Request for Transfer

Request for emergency transfer will be initiated by the tenant through contact with the agency case manager or housing provider who placed the tenant into housing.

Requests will be documented in writing by the staff receiving the request or written request from the tenant. Documentation will contain only information critical to facilitate safe transfer; use of a standardized form is preferred but not required as long as documentation includes the information that would be included on the form.

Assessment

Staff receiving the request will conduct a brief assessment to determine the type of transfer required (internal, external, inter-jurisdictional) and the urgency of transfer to ensure safety. Assessment may include review of the safety screening performed prior to placement in housing, or in cases where an immediate transfer is required, may be completed after moving the tenant to a safe setting that is temporary.

Use of the Campbell's Danger Assessment⁷ is the preferred risk and lethality assessment instrument; however, it is not required to initiate an immediate move to a safe setting. Experts caution that the risk assessment should be used shelter and service response programs and it should not be used by law enforcement or court systems⁸.

This assessment is protected by confidentiality in the records of a shelter or advocacy program and is protected by federal and state statutes that give specific confidentiality protections to domestic violence victims. Release of the risk-assessment instrument without explicit written release has dangerous implications for the victim and is prohibited by this policy.

Communication

To help maintain confidentiality, a secured distribution list and non-electronic communication are the preferred methods for arranging safe housing. Any electronic communications will include a statement of confidentiality

⁷ Campbell, J.C. (1995). *Assessing dangerousness*. Danger Assessment Newbury Park, CA: Sage

⁸ Journal of Interpersonal Violence 2009, published online 30 July 2008, State of Louisiana summary.

advising all unintended recipients of their responsibilities to immediately delete the communication, to retain confidentiality, and to advise the sender.

Key Features in Implementation

Immediate internal transfer: Safety of the tenant is paramount in the implementation of the ETP. Immediate transfer (within 48 hours) upon availability of safe unit and verification of eligibility is anticipated.

Trauma-informed care: Trauma informed care implies a framework that involves understanding, recognizing, and responding to the effects of all types of *trauma, including violence and the threat of violence*. *Trauma-informed* care means treating a whole person, taking into account past trauma and the resulting coping mechanisms when attempting to understand behaviors and treat the patient.⁹ The RTFH expects ETP providers to engage with ETP applicants in keeping with the principles of trauma-informed care.

Client Choice: If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit.

Preferred housing providers: Memoranda of Understanding (MOUs) with other housing providers can help facilitate rapid transfer. Housing providers are encouraged to develop MOUs

Outreach and Support: To assist tenants in accessing support services, the RTFH will provide information about CoC programs serving victims of violence and the 2-1-1 referral system. Pending processing of an emergency transfer and the actual transfer, tenants will be urged to take all reasonable precautions to be safe. VAWA suggests that tenants who are victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1–800–799–7233, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1–800–787–3224 (TTY). Additionally, tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network’s National Sexual Assault Hotline at 800–656–HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>. Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime’s Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.¹⁰

Personnel Facilitating Emergency Transfers

Personnel responsible for implementation of the ETP should evidence appropriate knowledge of the existing safety-first network of providers of victim services, lethality assessment, and have completed State Domestic Violence Certification training. As a component of the ETP, the RTFH will identify or develop a Domestic Violence High-Risk Response Team comprised of individuals possessing these qualifications.

Time limits

⁹ Compiled from the www.thenationalcouncil.org, psychology today, and the Alameda County CoC website.

¹⁰ VAWA, 2016 update, section

There are regulatory guidelines related to the incidence of a qualifying event. To initiate the ETP an incident or threat of violence must have occurred within past 90 days or within the past 180 days for early lease termination.

The RTFH housing provider cannot guarantee how long it will take to process a transfer request. The provider will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit, preferably within 48 hours.

Unit availability

If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant is being transferred. If no safe units are available for which a tenant who needs an emergency is eligible, HP will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, RTFH will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

If a safe unit is not available, the tenant may request an emergency transfer within the same housing provider must receive, at a minimum, additional priority that housing providers may already provide to other types of emergency transfer requests.

The tenant may request external emergency transfers concurrently with internal transfers if a safe unit is not immediately available. RTFH may be unable to provide immediate transfer to a particular program or unit if the tenant has not established or cannot establish eligibility for that unit.

Tenant transfer to a temporary safe housing location may be necessary for safety. In these instances, transfer may involve movement between housing types (such as moving from a permanent, or market place unit to an emergency safe house or sponsor-based facility). Immediate placement with a known hotel-motel provider will be used as a last resort and will be limited only to the time necessary to locate a more secure setting.

ETP ATTACHMENTS

Emergency Transfer Plan Checklist per VAWA 2016

Section 5.2005

(1) For purposes of this section, the following definitions apply:		
(i) <i>Internal emergency transfer</i> refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process.	Y/N	
(ii) <i>External emergency transfer</i> refers to an emergency relocation of a tenant to another unit here the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new unit.	Y/N	
(iii) <i>Safe unit</i> refers to a unit that the victim of domestic violence, dating violence, sexual assault, or stalking believes is safe.	Y/N	
(2) The emergency transfer plan must provide that a tenant receiving rental assistance through, or residing in a unit subsidized under, a covered housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer if:		
(i) The tenant expressly requests the transfer; and	Y/N	
(ii)(A) The tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; or	Y/N	
(B) In the case of a tenant who is a victim of sexual assault, either the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.	Y/N	
(3) The emergency transfer plan must detail the measure of any priority given to tenants who qualify for an emergency transfer under VAWA in relation to other categories of tenants seeking transfers and individuals seeking placement on waiting lists.	Y/N	
(4) The emergency transfer plan must incorporate strict confidentiality measures to ensure that the covered housing provider does not disclose the location of the dwelling unit of the tenant to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the tenant.	Y/N	
(5) The emergency transfer plan must allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available.	Y/N	
(6) The emergency transfer plan must describe policies for assisting a tenant in making an internal emergency transfer under VAWA when a safe unit is	Y/N	

<p>not immediately available, and these policies must ensure that requests for internal emergency transfers under VAWA receive, at a minimum, any applicable additional priority that housing providers may already provide to other types of emergency transfer requests.</p>		
<p>(7) The emergency transfer plan must describe reasonable efforts the covered housing provider will take to assist a tenant who wishes to make an external emergency transfer when a safe unit is not immediately available. The plan must include policies for assisting a tenant who is seeking an external emergency transfer under VAWA out of the covered housing provider’s program or project, and a tenant who is seeking an external emergency transfer under VAWA into the covered housing provider’s program or project. These policies may include:</p>		
<p>(i) Arrangements, including memoranda of understanding, with other covered housing providers to facilitate moves; and</p>	Y/N	
<p>(ii) Outreach activities to organizations that assist or provide resources to victims of domestic violence, dating violence, sexual assault, or stalking.</p>	Y/N	
<p>(8) Nothing may preclude a tenant from seeking an internal emergency transfer and an external emergency transfer concurrently if a safe unit is not immediately available.</p>	Y/N	
<p>(9) Where applicable, the emergency transfer plan must describe policies for a tenant who has tenant-based rental assistance and who meets the requirements of paragraph (e) (2) of this section to move quickly with that assistance.</p>	Y/N	
<p>(10) The emergency transfer plan may require documentation from a tenant seeking an emergency transfer, provided that:</p>		
<p>(i) The tenant’s submission of a written request to the covered housing provider, where the tenant certifies that they meet the criteria in paragraph (e)(2)(ii) of this section, shall be sufficient documentation of the requirements in paragraph (e)(2) of this section;</p>	Y/N	
<p>(ii) The covered housing provider may, at its discretion, ask an individual seeking an emergency transfer to document the occurrence of domestic violence, dating violence, sexual assault, or stalking, in accordance with § 5.2007, for which the individual is seeking the emergency transfer, if the individual has not already provided documentation of that occurrence; and</p>	Y/N	
<p>(iii) No other documentation is required to qualify the tenant for an emergency transfer.</p>	Y/N	
<p>(11) The covered housing provider must make its emergency transfer plan available upon request and, when feasible, must make its plan publicly available.</p>	Y/N	
<p>(12) The covered housing provider must keep a record of all emergency transfers requested under its emergency transfer plan, and the outcomes of such requests, and retain these records for a period of three years, or for a period of time as specified in program regulations. Requests and outcomes of such requests must be reported to HUD annually.</p>	Y/N	
<p>(13) Nothing in this paragraph (e) may be construed to supersede any eligibility or other occupancy requirements that may apply under a covered housing program.</p>	Y/N	

TRANSFER PLAN ATTACHMENT

Training and Support Features of the Emergency Transfer Plan

Optimal implementation of the RTFH Emergency Transfer Plan (RTP) rests on the ability to provide immediate response by personnel with a working knowledge of the local emergency shelter and housing systems, the needs of victims of violence, and laws applicable to protecting victims. The system includes resources beyond those funded by the U.S. Department of Housing and Urban Development (HUD) for homeless assistance.

Personnel implementing the RTFH ETP should evidence appropriate knowledge of the existing safety-first network of providers of victim services, lethality assessment, and have completed State Domestic Violence Certification training. As a component of the ETP, the RTFH will identify or develop a Domestic Violence High-Risk Response Team comprised of individuals possessing these qualifications. This team will offer periodic training at the request of the RTFH. Provision of a safe environment for victims of violence should be augmented by services that work to overcome the trauma associated with violence and ensure the tenant sense of safety. A myriad of services, such as legal assistance, personal or family counseling, education and advocacy concerning fair housing, transportation, or access to medical and mental health care may be needed. The RTFH ETP will include access to information about services available to victims of violence.

ATTACHMENT

Sample Certification and Verification Form

This form is completed by or on behalf of the victim of violence requesting an emergency transfer.

Date of request _____ Date Received by Authorized Provider _____

Name of victim: _____

Name of person completing form: _____

Names of family member or other persons on lease:

Names of additional persons residing in current housing unit: _____

Current residence of victim: _____

Name of Alleged Perpetrator (if known and safe to disclose): _____

Relationship of Alleged Perpetrator to Victim: _____

Date(s) and time(s) of incidence: _____

Brief Description of Incidents (attach pages if necessary): _____

Is this request the result of sexual assault on the premises within the past 90 days? ___Yes ___No

Describe why the victim believes they are at imminent harm if they remain in the current housing:

Names of third- party having knowledge of incidents (if any):

Certification: I certify that the information provided on this form is true and correct to the best of my knowledge and recollection and that the person(s) identified is / are or have been victim(s) of domestic violence, dating violence, sexual assault, stalking, or human trafficking. I acknowledge that submission of false information may jeopardize program eligibility and could be the basis of denial of assistance, revocation or termination of assistance, or eviction.

Date: _____