

COMMUNITY STANDARDS

SAN DIEGO CITY AND COUNTY CONTINUUM OF CARE
CA 601



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OVERVIEW OF THE COMMUNITY STANDARDS

THE CONTINUUM OF CARE

The Continuum of Care (CoC) is a regional body, consisting of stakeholders working together to address homelessness, designated by the U.S. Department of Housing and Urban Development (HUD) to undertake the following activities related to homelessness planning, coordination and funding for a geographic area:

- Promote community-wide commitment to the goal of ending homelessness;
- Provide funding for efforts by nonprofit providers and State and local governments to quickly rehouse individuals and families experiencing homelessness;
- Promote access to and effect utilization of mainstream programs by individuals and families experiencing homelessness; and
- Optimize self-sufficiency among individuals and families experiencing homelessness.

In San Diego, the San Diego City and County CoC (San Diego CoC) encompasses the geography of the entire San Diego region and is made up of stakeholders representing local government agencies, homeless services providers, faith-based organizations, law enforcement, healthcare, education, philanthropy, business partners, persons with lived experience, advocates, and others. The work of the CoC is led by the larger CoC membership, the CoC Advisory Board, and various committees. The Regional Task Force on the Homeless (RTFH) is designated and serves as the lead agency for the San Diego CoC. In this role, the RTFH is responsible for coordinating with the various CoC stakeholders, providing leadership and policy guidance, and supporting planning for the CoC. Additionally the RTFH is responsible for administering many of the HUD required activities of the CoC including serving as the collaborative applicant for the annual HUD CoC funding application, coordinating the annual Point-In-Time Count, administering the Homeless Management Information System (HMIS), overseeing the Coordinated Entry System (CES), monitoring system and project performance, and ensuring there are documented standards that govern the housing and services provided to individuals and families experiencing homelessness.

BACKGROUND

The HUD Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009, reauthorizing the McKinney-Vento Homeless Assistance Act of 1987 with important updates. The HEARTH Act implementation has occurred in stages, including the publication of the CoC Interim Rule on July 31, 2012, with an effective date of August 30, 2012. The overall goal of the HEARTH Act is to make homelessness rare, brief, and non-recurring by reducing the duration of time people spend homeless and reducing recidivism back into homelessness.

The San Diego CoC has funding through the HUD CoC and Emergency Solutions Grants (ESG) programs along with other federal, state, and local funding sources to undertake projects that work toward this goal. Projects (programs providing homeless assistance) funded through the CoC program include Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Supportive Services Only. Projects funded through the ESG program included Homelessness Prevention, Street Outreach, Emergency Shelter, and Rapid Re-Housing.

The HEARTH Act requires the CoC to have written policies and procedures that govern the provision of assistance to individuals and families under the CoC and ESG programs. These Community

Standards provide guidance to local providers in administering CoC-funded and ESG-funded assistance in the following areas:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive Permanent Supportive Housing assistance, Rapid Re-Housing assistance, and Transitional Housing assistance; and
- Standards for determining what percentage or amount of rent each program participant must pay while receiving Rapid Re-Housing assistance.

PURPOSE OF COMMUNITY STANDARDS

In alignment with HUD requirements, the goals of the San Diego CoC Community Standards are to:

- Establish community-wide expectations on the operations of projects, ensuring that persons experiencing homelessness who enter the CoC and ESG programs will receive consistent and coordinated care;
- Establish a minimum set of standards regarding the quality of housing and services provided; and
- Make local priorities transparent to recipients and sub-recipients of funds as well as individuals and families at-risk of or experiencing homelessness.

All programs that receive CoC or ESG funding are required to abide by these Community Standards. Additionally, any projects funded through the RTFH using state funding are required to follow these standards.

The CoC strongly encourages programs that do not receive either of these sources of funds to accept and utilize these Community Standards and for other public and private funders to adopt and incorporate these standards into their contracts for homeless assistance. The Community Standards are not intended to be in lieu of or in place of the Interim Regulations for the HEARTH Act but are intended to clarify local decisions regarding program administration. All HUD funded providers must follow the Interim Regulations in their entirety.

IMPLEMENTATION OF THE COMMUNITY STANDARDS

As the lead agency for the San Diego CoC, the RTFH will support the implementation and adherence to the Community Standards among homeless service providers by:

- Providing trainings, facilitating Learning Collaboratives, and distributing resources on best practices to support implementation and fidelity to the Community Standards;
- Conducting program monitoring to ensure program-level adherence to the Community Standards; and
- Monitoring system performance to regularly measure the community's overall progress in meeting the needs of people experiencing homelessness and gauge progress in preventing and ending homelessness in the region.

RTFH will provide access to the Community Standards to community stakeholders, including agencies receiving funding through the CoC and ESG programs, and other relevant grant funding, including funding targeted to addressing homelessness through the State of California. The Community Standards are subject to regular review and updates based on changes to local needs and requirements at the State and Federal level.

SYSTEM-LEVEL STANDARDS

The following section outlines expected standards to be implemented at the system-level to ensure that homelessness is rare, brief, and non-recurring in San Diego. These system standards apply to all CoC, ESG, and RTFH funded projects regardless of project type and are based on best practices.

HOUSING FIRST APPROACH

Housing First prioritizes rapid placement and stabilization in permanent housing without service participation requirements or preconditions for entry (such as sobriety, minimum income requirements, criminal record, completion of treatment, participation in services or other conditions that create barriers to entry). Case management and supportive services are offered to program participants to maximize housing stability and prevent returns to homelessness. Participation in these services is voluntary and based on the needs and desires of the program participant, but can and should be used to persistently engage participants to ensure housing stability.

A Housing First approach incorporates other best practices including harm reduction - a public health framework that seeks to minimize the harm of a given behavior if the individual is not willing to abstain - and a person-centered non-judgmental approach that is compassionate, respectful, and views every person individually, allows for people to make their own choices in regard to housing and services, and ensures services are tailored to each person's unique situation. A Housing First approach also removes unnecessary barriers and assumes that supportive services are more effective in addressing needs when an individual or family is sheltered or housed and the daily stress of experiencing homelessness is taken out of the equation.

A Housing First philosophy can and is recommended to be used in all phases of the homeless housing and services system, including Homelessness Prevention, Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, and Permanent Supportive Housing.

Additionally, [SB 1380](#), signed into law by Governor Jerry Brown in 2016, requires recipients of California state funding that provides housing or housing-related services to people experiencing homelessness adopt guidelines and regulations to include Housing First policies.

TRAUMA-INFORMED CARE APPROACH

Projects are expected to utilize a trauma-informed care approach to provide housing and services to persons experiencing homelessness. The U.S. Department of Health and Human Services (HHS) Substance Abuse and Mental Health Services Administration (SAMHSA) provides the following framework for the provision of trauma-informed care:

A program, organization, or system that is trauma-informed realizes the widespread impact of trauma and understands potential paths for recovery; recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system; and responds by fully integrating knowledge about trauma into policies, procedures, and practices, and seeks to actively resist re-traumatization.¹

Homeless service providers must incorporate the principles of trauma-informed care throughout key components of their programs, including in program written policies and procedures and staff training protocols.

¹ Substance Abuse and Mental Health Services Administration. SAMHSA's Concept of Trauma and Guidance for a Trauma-Informed Approach. HHS Publication No. (SMA) 14-4884. Rockville, MD: Substance Abuse and Mental Health Services Administration, 2014, page 9.

ADDRESS RACIAL DISPARITIES

Significant racial disparities exist within San Diego's population experiencing homelessness, especially among Black and African American persons. Projects are expected to address racial disparities that exist within their programs and organizations and promote racial equity. This includes the following:

- Review program data on participant race and ethnicity collected in HMIS – including participants served, length of time in the program, housing placements, housing stability, and other outcomes such as income attainment and non-cash benefits attainment – to ensure the program is serving people at equitable rates and achieving equitable outcomes based on the demographics of persons experiencing homelessness in San Diego.
- Review program environment to ensure that it is culturally inclusive such as understanding what holidays are being celebrated, providing bilingual signs/forms, and others.
- Analyze existing policies and processes to ensure that they do not create unintentional barriers for people of color to access, engage, and remain connected to housing and/or services.
- Analyze program policies to see if people are experiencing different results of certain policies or ways they are enforced.
- Seek regular training for staff on racial equity and inclusion and organizations
- Seek to diversify staff and Board composition to help ensure personnel is as reflective as possible of those experiencing homelessness within their programs.

INCLUSION OF INDIVIDUALS WITH LIVED EXPERIENCE

Individuals with lived experience are experts in homeless services. Projects need to provide opportunities for people who have lived experience of homelessness to provide expert advice and opinions on policy, procedures, and services delivery. Projects are expected to engage participants in ongoing program evaluation, solicit feedback on program services quality, and make improvements based on input.

The CoC Program requires that each recipient and subrecipient involve, to the maximum extent practicable, persons experiencing homelessness through employment, volunteer services, or otherwise constructing, rehabilitating, maintaining, operating, and providing services for CoC projects. Additionally, each CoC and ESG funded organization must have participant representation on a governing or decision-making body within the organization as well as promote the hiring of people with lived experience.

CoC and ESG funded programs are strongly encouraged to appropriately compensate participation of persons with lived experience for their expertise in project design, implementation, and decision-making processes. ESG Administrative funds or CoC planning resources may be used to compensate people with lived experience for their time working on CoC planning activities. ESG administrative funds may also be used to pay personnel costs for subrecipient staff to provide administrative support and training for persons with lived experience who are participating in planning processes. All programs are encouraged to seek out private funding to support appropriate compensation for persons with lived experience.

COORDINATED ENTRY PARTICIPATION

CES is a HUD mandated system process that standardizes the steps of moving individuals and families towards housing. CES serves as a centralized system for people experiencing a housing crisis to access assistance through a process that coordinates program participant access, assessment, prioritizations and referrals to homeless housing and services. The CoC Board has adopted [Coordinated Entry System Policies and Procedures](#) for the San Diego CoC, including extensive guidelines for participation in the CES system.

All CoC and ESG projects are required to participate in CES. State-funded and other homeless service providers are strongly encouraged to participate in CES to improve system-wide utilization and coordination of homeless response resources. Participation requires following all established policies and procedures outlined in the CES Policies and Procedures.

HOMELESS MANAGEMENT INFORMATION SYSTEM USE

HMIS is a local web-based information system that the San Diego CoC uses to collect client-level data on the provision of housing and services to individuals and families through the homeless response system. The CoC uses the software Clarity for its HMIS installation. RTFH serves as the CoC's HMIS Lead Agency. In this role, RTFH sets policy, performs executive functions and provides strategic direction and oversight for San Diego's HMIS. This includes oversight of technical design, implementation and operation of the HMIS, managing the day-to-day system operations, and providing training and technical support for all HMIS users.

The HEARTH Act requires that all CoC and ESG-funded projects participate in the HMIS. All projects must comply with HUD's standards on participation, data collection, and reporting under a local HMIS and the San Diego CoC's [HMIS Policies and Procedures](#). The CoC strongly encourages non-HUD funded organizations to participate in San Diego's HMIS.

DATA TO INFORM PROGRAM DECISION-MAKING

All projects are expected to regularly review program data throughout the year to support ongoing program decision-making and use data to make program improvements. Projects need to analyze key performance indicators including length of time in programs, successful placements in housing, income and non-cash benefits attainment, and returns to homelessness. Projects have the capacity to regularly run reports in HMIS such as the Annual Performance Report (APR) and others to review program performance data. Additionally, the RTFH has the Project Performance Dashboard available on the RTFH website for programs to review their data and compare themselves to their peers. Projects should discuss their data regularly among staff and other stakeholders to understand current performance, strategize activities for improvement, and set new timelines for further review.

In addition to performance data, projects need to also regularly review program data for quality and timeliness of entry and ensure high data quality. It is expected that projects input data into the HMIS in real-time, with the minimum expectation that data is entered within three business days from collection as outlined in the HMIS Policies and Procedures. This minimum expectation for data timeliness helps to ensure the reliability and validity of client-level data collected in HMIS.

FAIR HOUSING, EQUAL OPPORTUNITY AND EQUAL ACCESS

All projects must comply with the non-discrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 C.F.R. 5.105(a) and 24 C.F.R. 5.2005, including, but not limited to the following:

- Fair Housing Act
- Section 504 of the Rehabilitation Act
- Title VI of the Civil Rights Act
- Title II of the Americans with Disabilities Act
- HUD's Equal Access Rule
- Violence Against Women Act (VAWA) Protections
- Local and state non-discrimination laws

Affirmatively Furthering Fair Housing: Projects must have non-discrimination policies in place and conduct assertive outreach to people least likely to engage in the homeless system. Organizations receiving CoC and/or ESG Program funding shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, ancestry, marital status, sexual orientation, gender identity or disability; and, shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws.

Integration and Accessibility (Fair Housing and Equal Opportunity): Housing and services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. Providers shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible.

Reasonable Accommodations and Modifications for Persons with Disabilities: Projects are required to provide reasonable accommodations and modifications for persons with disabilities. Under the Fair Housing Act, a reasonable modification is a structural change made to the premises whereas a reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service. A person with a disability may need either a reasonable accommodation or a reasonable modification, or both, in order to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Generally, under the Fair Housing Act, the housing provider is responsible for the costs associated with a reasonable accommodation unless it is an undue financial and administrative burden, while the tenant or someone acting on the tenant's behalf, is responsible for costs associated with a reasonable modification.² Recipients must inform applicants during the intake process of their right to request a reasonable accommodation or modification.

Discrimination Based on Actual or Perceived Gender: HUD's [Equal Access in Accordance with Gender Identity Final Rule \(Equal Access Rule\)](#) requires that HUD-funded housing and shelter be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. The rule defines "gender identity" to mean "actual or perceived gender-related characteristics." The final rule also prohibits owners and administrators of HUD-assisted or HUD-insured housing, approved lenders in an FHA mortgage insurance program, and any other recipients or subrecipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing.

Discrimination Based on Household Composition: Projects cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any member of

² [Joint Statement of HUD and DOJ on Reasonable Modifications](#), Washington, DC, March 5, 2008

the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household. Projects that serve families with children must serve all types of families with children; if a project targets a specific population, (e.g. Veterans experiencing homelessness), these projects must serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults who reside together.

EMERGENCY TRANSFER FOR VICTIMS OF DOMESTIC VIOLENCE

Projects serving individuals or families qualified under Category 4 of the Defining “Homeless” Rule (persons fleeing or attempting to flee violent situations) must follow all related federal and state laws and confidentiality policies and must establish written policies and procedures regarding the provision of specific services to meet the safety and special needs of this population. RTFH promotes the safety of tenants by establishing an [Emergency Transfer Plan \(ETP\)](#) policy and protocol to guide the housing relocation process for tenants who are at imminent risk of harm if they remain in their current housing unit. 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 a 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.

TERMINATION AND GRIEVANCE PROCEDURES

Projects must have a written grievance procedure, including a formal process for participants to provide feedback and to resolve conflicts experienced within the project. Projects must inform clients of their right to file a grievance and provide clients with a written copy of the grievance procedure upon program intake. Clients have the right to receive a response back when they file a grievance and to the right to appeal the project’s response. Grievance procedures should provide a reasonable timeframe within which the project will respond to client grievances; the timeframe for a client to appeal the project’s response; and the process for submitting an appeal.

Projects must have a written termination policy outlining project expectations and termination processes, including a formal due process. Terminations may only occur in the most severe circumstances. Termination from housing projects should not prohibit the household from being readmitted into the program at a future date. Emergency shelters and other congregate programs may have different standards for termination of assistance and restrictions on reentry for clients that significantly violate project expectations and create dangerous situations for staff and other clients (e.g. violence against others, severe property damage). Any restrictions on reentry should be project-specific and should not restrict client participation in other supportive services, shelters, or housing programs in the region that can help resolve their housing crisis.

PROJECT-LEVEL STANDARDS

This section defines project-specific expectations and requirements including eligibility, prioritization, minimum standards, and performance benchmarks. Projects funded under the CoC and ESG programs and through RTFH are required to use these standards. RTFH strongly encourages all other projects regardless of funding source to follow the written standards for their project type to the greatest extent possible.

HOMELESSNESS PREVENTION

Homelessness Prevention aids individuals and families in a permanent housing setting facing imminent housing loss to prevent them from moving to an emergency shelter, a place not meant for human habitation, or another location described in paragraph (1) of HUD's homeless definition. Services may include:

- Rental assistance: Rental assistance and rental arrears
- Financial assistance: Rental application fees, security and utility deposits, utility payments, last month's rent, moving costs
- Services: Housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

Homelessness Prevention is designed to allow individuals and families receiving assistance to remain stably housed after the conclusion of such assistance.

PARTICIPANT ELIGIBILITY

For ESG Homelessness Prevention programs, assistance may be provided to households who meet the criteria under the At Risk of Homelessness definition, or who meet the criteria in paragraph (2), (3), or (4) of the homeless definition and have an annual income below 30% of Area Median Income (AMI). Eligibility documentation requirements vary depending on which criteria are met. For Homeless Category 2, the household will lose their housing within 14 days while for At Risk Category 1C, the household has been notified in writing that their right to occupy housing will be terminated within 21 days.

Homelessness Prevention programs that are funded through local, state, private, or other federally funded sources may use the above standards for ESG programs, or may establish their own standards regarding participant eligibility in alignment with funding source requirements. Programs that establish their own standards ensure that they are targeting Homelessness Prevention resources to individuals and households most in need of assistance. It is recommended that all Homelessness Prevention programs serve households with an annual income that is no greater than 60% of AMI to ensure that these resources are prioritized for those households at greatest risk of experiencing homelessness without assistance.

PRIORITIZATION

Prioritization for Homelessness Prevention assistance is given to individuals and families meeting Category 2 of the Homeless definition who have: (1) a past episode of homelessness within the last 12 months, (2) a past episode of homelessness, and (3) no prior episodes of homelessness.

CES does not refer to Homelessness Prevention Programs.

MINIMUM STANDARDS FOR HOMELESSNESS PREVENTION ASSISTANCE

The following standards apply specifically and in their entirety to ESG Homelessness Prevention programs. Other Homelessness Prevention Programs are encouraged to accept and utilize these

minimum standards, but have the flexibility to adapt these standards to align with their funding source requirements as desired and appropriate.

- Projects must assess each household's situation prior to administering financial assistance and use diversion/housing problem solving techniques to try and resolve the housing crisis before providing Homelessness Prevention services and assistance.
- Participants must have a written lease in order to receive rental assistance.
- Eligible participants are able to receive up to 24 months of rental assistance during any 3-year period.
- Participants receiving more than one-month rental assistance are required to meet with their case manager at least once per month.
- If financial assistance is warranted the project uses a progressive engagement approach that only provides the level assistance necessary to resolve the housing crisis and ensure stability.
- Participants are required to contribute 30% of their monthly adjusted income towards rent at minimum and seek to take on full rent as quickly as possible.
- Rental assistance will only be provided through the ESG program if the total rent for the unit does not exceed the fair market rent (FMR) established by HUD and complies with HUD's standard of rent reasonableness, unless a waiver is in effect allowing for rents to exceed FMR.
- Once the housing crisis is stabilized, projects will connect households to community-based services and resources to ensure long-term stability. This may include employment, legal, food, health, mainstream benefits, and others.
- When ESG Rental Assistance and/or Housing Relocation and Stabilization Services are provided under the Homelessness Prevention component to help a program participant remain in or move into permanent housing, the ESG minimum habitability standards apply to either the current unit (if the program participant is staying in place) or to a new unit (if the program participant is moving).

MINIMUM PERFORMANCE BENCHMARKS FOR HOMELESSNESS PREVENTION

- 82% or more of all participants will exit to a permanent housing destination³

STREET OUTREACH

Street Outreach is a professional homeless services intervention that supports unsheltered individuals with accessing permanent or temporary housing by building trusting relationships and ongoing rapport. Street Outreach seeks to engage individuals living unsheltered in a culturally competent and trauma informed manner, provide links to mainstream services, and use diversion and problem-solving techniques to connect people with safe housing options whenever possible. The goal of street outreach is to find affordable housing for each individual which often requires time and multiple ongoing interactions with individuals experiencing unsheltered homelessness. Each interaction should be seen as an opportunity for outreach staff to build a relationship and help people work toward making a connection to housing and services.

In 2019 and 2020, the RTFH, public funders, and street outreach providers worked collaboratively with OrgCode Consulting to develop a set of Street Outreach standards for the region. The standards developed with OrgCode serve as our [San Diego CoC Street Outreach Standards](#). Street Outreach programs also need to follow the policy guidelines in the CoC adopted [Policy Guidelines for Regional](#)

³ The performance benchmarks were adopted by the CoC board based on the [recommendations of a 2019 Ad Hoc Committee on Standards and Measures](#) that reviewed existing project performance and set benchmarks to improve at minimum on current performance. Benchmarks will need to be set each year based on prior years performance.

[Response for Addressing Unsheltered Homelessness and Encampments Throughout San Diego County.](#)

PARTICIPANT ELIGIBILITY

For ESG Street Outreach programs, individuals and families must meet the HUD definition of Literally Homeless (Category 1) and specifically have a primary nighttime residence that is a public or private place not meant for human habitation (unsheltered persons).

Street Outreach programs that are funded through local, state, private, or other federally funded sources may use the above standards for ESG programs, or may establish their own standards regarding participant eligibility in alignment with funding source requirements. Programs that establish their own standards should ensure that they are targeting Street Outreach resources to individuals and families in unsheltered situations.

PRIORITIZATION

Prioritization follows the CoC Prioritization Policy (Appendix B). Additionally, street outreach services may at times be prioritized to people who may be living in a specific encampment that has been identified for closure and who may need more immediate transition assistance. Lastly, according to the CoC adopted Unsheltered Policy, Street Outreach services should be prioritized and targeted to those individuals identified as most in need. Street Outreach services should target those most in need of more intensive services, encompassing case management and navigation services and be provided over a longer duration to a smaller group of individuals focused on housing placement. Street Outreach services will still be provided to a broader population of unsheltered individuals (contact-based outreach), however more intense and ongoing services are provided to a smaller subset of those in greatest need (solution-focused outreach). In accordance with the [San Diego CoC Street Outreach Standards](#), prioritization of persons experiencing unsheltered homelessness for street outreach services should be person-centered, client-led, and informed by Motivational Interviewing techniques.

MINIMUM STANDARDS FOR STREET OUTREACH

The minimum standards for Street Outreach can be found in the [San Diego CoC Street Outreach Standards](#).

MINIMUM PERFORMANCE BENCHMARKS FOR STREET OUTREACH

- 27% or more of all participants will exit to a successful destination that includes both temporary and permanent housing destinations as defined by HUD System Performance Measure 7a (Successful Placement from Street Outreach).⁴

EMERGENCY SHELTER

Emergency Shelter is a low-barrier temporary housing program, in which households experiencing homelessness are provided emergency access to shelter and services without unnecessary barriers or prerequisites to assistance. Emergency Shelters provide services to meet the immediate safety and survival needs of the individual or family served, which may include shelter, food, clothing and other support services while being housing focused to help participants enter permanent housing.

⁴ The performance benchmarks were adopted by the CoC board based on the [recommendations of a 2019 Ad Hoc Committee on Standards and Measures](#) that reviewed existing project performance and set benchmarks to improve at minimum on current performance. Benchmarks will need to be set each year based on prior years performance.

PARTICIPANT ELIGIBILITY

For ESG Emergency Shelter programs, 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).

Emergency Shelter programs that are funded through local, state, private, or other federally funded sources may use the above standards for ESG programs, or may establish their own standards regarding participant eligibility in alignment with funding source requirements.

PRIORITIZATION

Prioritization follows the CoC Prioritization Policy (Appendix B). CES does not refer to Emergency Shelter Programs.

MINIMUM STANDARDS FOR EMERGENCY SHELTER

The following standards apply specifically and in their entirety to ESG Emergency Shelter programs. Other Emergency Shelter programs are encouraged to accept and utilize these minimum standards, but have the flexibility to adapt these standards to align with their funding source requirements as desired and appropriate.

- Use a Housing First approach with low barrier admission policies and program operations. Participants cannot be denied entry based on active substance use, limited or no income, current or prior criminal justice involvement, health and mental health challenges, and medication adherence.
- Use a housing focused approach that strives to exit participants to permanent housing as quickly as possible while ensuring basic needs are met and connecting participants to available services.
- Participants may reside in an emergency shelter for the length of time established by each provider's program policies and procedures.
- Do not require occupants to sign leases or occupancy agreements or charge fees or rent to shelter participants.
- Have the availability to operate and allow participants to remain in the shelter 24 hours a day, or as close to 24 hours a day as feasible given shelter and staff capacity.
- Ensure a safe environment for shelter participants and corresponding policies and procedures, including emergency preparedness procedures, are available to staff and participants.
- Diversion services are provided to support participants to resolve their housing crisis immediately.
- Supportive services, including case management, are available to assist persons in obtaining permanent housing as quickly as possible and accessing supportive services. Each participant with staff should create a housing plan.
- Facilities need to provide access (on-site or through program referrals) to meals, clean restrooms and showers, hygiene supplies, laundry facilities, and adequate space for participants to store personal belongings. Facilities must also ensure compliance with public health directives regarding adequate spacing.
- Shelters are strongly encouraged to allow participants' pets to remain in the shelter to create as few barriers to shelter as possible for persons experiencing homelessness. Shelters that allow pets should develop reasonable pet accommodation policies, including considerations for conduct and responsibility regarding pets and their owners; how supplies and resources such as food, crates or kennels will be provided; and how access to veterinary care will be provided.

- Termination or exit from the shelter must only be used when all other options have been explored and this step is necessary to protect the health and safety of staff and participants or when repeated and severe violation of program expectations cannot otherwise be resolved. Programs will document the behavior, any attempts to remedy the issue, program violation, or threat, and the efforts to secure more appropriate housing.
- All 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 participant in finding alternatives.

MINIMUM PERFORMANCE BENCHMARKS FOR EMERGENCY SHELTER

- 26% or more of all participants will exit to a permanent housing destination⁵

TRANSITIONAL HOUSING

Transitional housing is time-limited temporary housing program (up to 24 months) that provides a variety of supportive services to facilitate the movement of households experiencing homelessness to permanent housing.

PARTICIPANT ELIGIBILITY

For CoC Transitional Housing Programs, 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). Transitional housing projects must also follow any additional eligibility criteria set forth in the HUD CoC NOFA through which a project was funded and the grant agreement.

Transitional Housing programs that are funded through local, state, private, or other federally funded sources may use the above standards for CoC programs, or may establish their own standards regarding participant eligibility in alignment with funding source requirements.

PRIORITIZATION

Prioritization follows the CoC Prioritization Policy (Appendix B). CES does not refer to Transitional Housing Programs.

MINIMUM STANDARDS FOR TRANSITIONAL HOUSING

The following standards apply specifically and in their entirety to CoC Transitional Housing programs. Other Transitional Housing programs are encouraged to accept and utilize these minimum standards, but have the flexibility to adapt these standards to align with their funding source requirements as desired and appropriate.

- Assistance in helping participants transition to permanent housing must be made available/provided as early as possible.
- Participants in Transitional Housing must enter into a lease, sublease or occupancy agreement upon program entry for a term of at least one month.
- Facilities need to provide meals, clean restrooms and showers, hygiene supplies, laundry facilities, have adequate space for participants to store personal belongings, and ensure compliance with public health directives regarding adequate spacing.
- Supportive services must be offered throughout the duration of the stay.

⁵ The performance benchmarks were adopted by the CoC board based on the [recommendations of a 2019 Ad Hoc Committee on Standards and Measures](#) that reviewed existing project performance and set benchmarks to improve at minimum on current performance. Benchmarks will need to be set each year based on prior years performance.

- Educational advancement, job preparation and employment attainment, and health and behavioral health care services must be provided or coordinated through external referrals.
- Assistance in accessing mainstream benefits, including benefits such as CalFresh, CalWORKS, General Relief, disability, childcare assistance, health insurance, must be provided.
- Individualized case management is available at minimum every week to each household who is admitted into the program.
- Maximum length of stay cannot exceed 24 months for CoC-funded programs. It is recommended that programs only provide housing and services for what is essential for the person to move to stable permanent housing.

MINIMUM PERFORMANCE BENCHMARKS FOR TRANSITIONAL HOUSING

- 47% or more of all participants will exit to a permanent housing destination⁶

RAPID RE-HOUSING

Rapid Re-Housing is a person-centered intervention designed to help individuals and families quickly exit homelessness and obtain/maintain permanent housing in the community and remain stably housed. The program provides housing location services, rental assistance, and case management support that is tailored to the unique needs of each participant.

In 2019 and 2020, the RTFH, public funders, and Rapid Re-Housing providers worked collaboratively with a consultant to develop a set of [Rapid Re-Housing Operating Standards](#) for the region.

PARTICIPANT ELIGIBILITY

For CoC and ESG Rapid Re-Housing programs, individuals and families must meet the HUD definition of Literally Homeless (Category 1) or Fleeing/Attempting to Flee Domestic Violence (Category 4).

Rapid Re-Housing programs that are funded through local, state, private, or other federally funded sources may use the above standards for CoC programs, or may establish their own standards regarding participant eligibility in alignment with funding source requirements.

PRIORITIZATION

Prioritization follows the CoC Prioritization Policy (Appendix B) as well as CES prioritization guidelines within the Coordinated Entry System Policies and Procedures. Rapid Re-Housing programs must receive referrals from CES for program enrollment.

MINIMUM STANDARDS FOR RAPID RE-HOUSING

The minimum standards for Rapid Re-Housing can be found in the San Diego CoC [Rapid Re-Housing Operating Standards](#)

MINIMUM PERFORMANCE BENCHMARKS FOR RAPID RE-HOUSING

- 56% or more of all participants will exit to permanent housing

⁶ The performance benchmarks were adopted by the CoC board based on the [recommendations of a 2019 Ad Hoc Committee on Standards and Measures](#) that reviewed existing project performance and set benchmarks to improve at minimum on current performance. Benchmarks will need to be set each year based on prior years performance.

JOINT TRANSITIONAL HOUSING AND RAPID RE-HOUSING

Joint Transitional Housing and Rapid Re-Housing Component projects (Joint Projects) provide transitional housing with the availability of financial assistance and supportive services through Rapid Re-Housing to support housing placement and stabilization as needed. Joint Projects incorporate both the Transitional Housing and Rapid Re-Housing standards above.

PARTICIPANT ELIGIBILITY

For CoC Joint Transitional Housing and Rapid Re-Housing Component projects, individuals and families must meet the following criteria:

- Residing in a place not meant for human habitation; or
- Residing in an emergency shelter; or
- Residing in a TH project that is being eliminated; or
- Residing in TH being funded by another Joint Component project; or
- Meeting Category 4 of the homeless definition; or
- Receiving services from a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.⁷

PRIORITIZATION

Prioritization follows the CoC Prioritization Policy (Appendix B) as well as CES prioritization guidelines within the Coordinated Entry System Policies and Procedures. CES does refer into the Rapid Re-Housing component of Joint Projects but does not refer into the Transitional Housing component.

MINIMUM STANDARDS FOR JOINT PROJECTS

Joint Projects incorporate both the Transitional Housing and Rapid Re-Housing standards above. In addition, the following minimum standards apply specifically and in their entirety to CoC Joint Projects:

- Use a Housing First approach, including low barrier admission policies and program operations; client-driven service models; and client choice.
- Joint Projects must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all program participants up to 24 months as needed by the program participants.
- Although Joint Projects include both Transitional Housing and Rapid Re-Housing components, participation in both is not required; rather, households may opt into only accessing one of the components based on their needs.

MINIMUM PERFORMANCE BENCHMARKS FOR JOINT PROJECTS

For performance benchmarks, Joint Projects will adopt the benchmarks for the appropriate project type – either Transitional Housing or Rapid Re-Housing – depending on the given project type that the household is exiting from.

⁷ [HUD Joint TH-RRH Component Training](#), June 18, 2019.

PERMANENT SUPPORTIVE HOUSING

Permanent Supportive Housing is permanent subsidized housing with indefinite leasing or rental assistance paired with intensive wraparound supportive services to assist people who are experiencing homelessness and have a disability or families with an adult or children member with a disability, and those with severe service needs and lengthy or repeated episodes of homelessness achieve housing stability.

PARTICIPANT ELIGIBILITY

For CoC-funded Permanent Supportive Housing programs, participants must meet the following eligibility requirements:

- The individual or household must meet the definition of homeless in the CoC Program Interim Rule, under Category 1 or Category 4 of the HUD homelessness definition.
 - Category 1 participants may enter from a place not meant for human habitation, an emergency shelter or government/charity-funded motel (emergency voucher), a Safe Haven (as defined by HUD), or one of the above places but temporarily – for no more than 90 days– in an institution.
 - Participants who are homeless under Category 1 and are entering from transitional housing must have entered the transitional housing program from emergency shelter or a place not meant for human habitation. If the project is designated for persons experiencing chronic homelessness, the participant may only enter from the street or shelter.
- The individual or at least one member of the household must have a disability of long duration. Please see **Appendix A** for HUD's definition of "homeless individual with a disability". HUD accepts the following forms of documentation to verify one's disability status. HUD does not accept self-certification for documenting disability - the only acceptable forms of documentation are described below.
 - Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently; or
 - Written verification from the Social Security Administration; or
 - The receipt of a disability check; or
 - Intake staff-recorded observation of a disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in this; or
 - Other documentation approved by HUD.
- Projects that are dedicated chronically homeless projects must continue to serve people experiencing chronic homelessness exclusively.
- Program participants receiving Rapid Re-Housing or Joint Project assistance maintain their chronically homeless status for the purpose of eligibility for Permanent Supportive Housing (so long as they meet any other additional eligibility criteria for the program).

Permanent Supportive Housing programs that are funded through local, state, private, or other federally funded sources may use the above standards for CoC programs, or may establish their own standards regarding participant eligibility in alignment with funding source requirements. Programs that establish their own standards should ensure that they are targeting Permanent Supportive Housing resources to households with severe service needs that require the high level of assistance provided, including individuals and families with disabilities and those who have experienced lengthy or repeated episodes of homelessness.

PRIORITIZATION

Prioritization follows the CoC Prioritization Policy (Appendix B) as well as CES prioritization guidelines within the Coordinated Entry System Policies and Procedures. Permanent Supportive Housing programs must receive referrals from CES for program enrollment.

MINIMUM STANDARDS FOR PERMANENT SUPPORTIVE HOUSING

The following standards apply specifically and in their entirety to CoC Permanent Supportive Housing programs. Other Permanent Supportive Housing programs are encouraged to accept and utilize these minimum standards, but have the flexibility to adapt these standards to align with their funding source requirements as desired and appropriate.

- There can be no predetermined length of stay for a Permanent Supportive Housing project.
- Participants in CoC Permanent Supportive Housing must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month. Non-CoC-funded Permanent Supportive Housing programs are strongly encouraged to establish an initial lease term of one year to promote housing stability, but may operate with a shorter lease term if allowable under their funding requirements.
- Supportive services are voluntary, designed to meet the needs of the participants, focused on ensuring housing stability, and must be made available to the participants throughout the duration in housing. Declining to participate in services is not grounds for termination from the program. Providers are encouraged to utilize assertive outreach and engagement efforts with participants who are not willing to engage in case management or supportive services using best practices such as Motivational Interviewing to help support successful housing outcomes.
- Use a harm reduction approach to address issues of substance use, mental health, and other challenges if the person is not willing to abstain from certain behaviors.
- Projects must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a participant's assistance is terminated only in the most severe cases.
- Participant contributions to housing costs do not exceed established local rent reasonableness or maximum allowed by funding source.
- 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.

MINIMUM PERFORMANCE BENCHMARKS FOR PERMANENT SUPPORTIVE HOUSING

- 95% of participants will retain housing or exit to permanent housing⁸

⁸ The performance benchmarks were adopted by the CoC board based on the [recommendations of a 2019 Ad Hoc Committee on Standards and Measures](#) that reviewed existing project performance and set benchmarks to improve at minimum on current performance. Benchmarks will need to be set each year based on prior years performance.

APPENDIX A: RELEVANT DEFINITIONS

HUD DEFINITION OF HOMELESSNESS

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 STATUTES⁹

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 4: FLEEING/ATTEMPTING TO FLEE DOMESTIC VIOLENCE

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.

⁹ 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.

HUD DEFINITION OF CHRONICALLY HOMELESS

(1) A “homeless individual with a disability,” as defined in the Act, who:

- Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months

(2) An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition before entering that facility; or

(3) 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 of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

HUD DEFINITION OF 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.)

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: Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, and to 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)

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