



DANE COUNTY
WRITTEN STANDARDS
2024

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INTRODUCTION

The Continuum of Care (CoC) plans and coordinates a system of homeless housing and services in order to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the Continuum. The local CoC encompasses Madison and Dane County and is called the Homeless Services Consortium (HSC). These standards are intended to guide all operations that align with the HSC Community Plan to Prevent and End Homelessness

The Continuum of Care (CoC) and Emergency Solutions Grant (ESG) Program Interim Rules require recipients of ESG funds and CoCs to develop, in coordination with each other, written standards for administering assistance. All programs that receive CoC, ESG, and State of Wisconsin Emergency Solutions Grant/Housing Assistance Program/Homeless Prevention Program (EHH) must abide by the applicable sections of the standards in full. Programs funded through other sources are highly encouraged to follow these standards and may be required by the funders to comply with the standards. These standards do not replace policies and procedures created by homeless services providers, but rather they provide an overall context for programs funded with federal, state and local funding. The HSC acknowledges that the Written Standards are a HUD requirement and may be unintentionally exclusionary and welcomes feedback to explore how to standardize and improve the process of implementing the Community Plan to Prevent and End Homelessness. Feedback may be sent to hsc@cityofmadison.com.

The written standards will:

- Establish community-wide expectations on the operations of projects within the community;
- Ensure the system is transparent to users and operators; and
- Establish a minimum set of standards and expectations in terms of the quality expected of projects.

The first version of the written standards was developed by the HSC Written Standards Committee and approved by the HSC Board of Directors (Board) in consultation with ESG recipients in 2016. The standards are reviewed annually by the HSC Core Committee and recommended changes are approved by the Board.

In reviewing and updating the standards, the Core Committee uses the HSC listserv to invite HSC members to join the process. Recommendations for changes to the standards go out to the HSC for feedback and are presented to the HSC Board. The Board reviews and approves the standards. The Board meeting is open to the public and the agenda is publicly noticed, allowing opportunities for the public to provide input.

Changes made in the standards go into effect within 90 days of the Board approval of the changes, unless specified otherwise by the Board. The Board or the CoC Coordinator as designated by the Board is responsible for notifying the agencies receiving CoC, ESG, EHH, or other public funds that require compliance with the standards in writing.

The Board uses the written standards when evaluating program applications for the CoC, ESG and EHH funds. Programs that fail to abide by the standards may not be approved for future CoC, ESG, or EHH funding.

- CoC and ESG funded programs will complete the written standards checklist as a self-monitoring tool and submit to CoC Coordinator annually. CoC Coordinator will pass them onto the Board and appropriate funders.
- The Board designee for ESG, EHH, and CoC funds will use the written standards checklist to review compliance with the standards during monitoring. Programs found not in compliance with the standards must work with the funder or funding administrator to address the compliance issue within timeframe designated by the funder. Results of the written standards compliance monitoring and approved plans of correction will be shared with the Board upon funder's approval of plan of correction. In limited circumstances, a waiver may be requested to the Board if an agency cannot reasonably comply with the standards. The Board may grant or deny a waiver or choose to revise the standards.

If an agency disagrees with non-compliance finding with the standards, the agency may submit a written notice of appeal to the entity issuing the non-compliance finding within 30 days. The Board will make the final determination if the agency is in compliance with the standards.

The Board will use the agency self-monitoring and funder monitoring results regarding written standards compliance to inform strategy development (e.g. training, peer support, shared tool, etc.) to move the CoC towards increased compliance with the standards. The Board will facilitate training for any major changes in the standards.

If someone believes a project is in violation of the Written Standards, they are encouraged to first talk to the provider directly about the violation. If the situation is not resolved, they may reach out to the CoC Coordinator or the CoC Board of Directors to report the violation. The below process will be followed in response to a complaint:

1. The CoC Coordinator will document the complaint and conduct an initial investigation. The CoC Coordinator will communicate with both the person submitting the complaint and the agency to determine next steps.
2. The CoC Coordinator will notify the CoC Board and other funders of the program about the complaint and next steps. The Board will go into a closed session to discuss the complaint.
3. If warranted, the CoC Coordinator will further investigate the concern. At least one CoC Board Member will participate in the investigation. Additional stakeholders may be brought into the investigation as necessary and may include the HMIS lead, funders, etc. The CoC Coordinator and Board Member will determine whether or not the program is in violation of the Written Standards. If a violation has occurred, they will work with the agency to develop a plan and timeline for correction. The plan may include technical assistance, updates to policies and procedures, additional staff training, etc. The Board of Directors will be notified of the plan within 90 days.

4. Unresolved violations of the Written Standards will become a matter of record and may have bearing on funding decisions in future competitions as determined by the Board of Directors. The Board will go into closed session for discussions affecting funding.
5. Any further appeals will be made to the project funder.
6. The CoC Coordinator will keep records of concerns of Written Standards compliance, investigations, findings and correction plans to be shared with the CoC Board of Directors and relevant funding Review Committees.

In keeping with the goals and objectives of the Dane County “Community Plan to Prevent and End Homelessness,” all activities provided through the agencies of the Homeless Services Consortium should further the mission of preventing or ending homelessness for households in need.

In addition to the services provided by each agency, each program will play an active role in connecting participants to mainstream services, which are services not specifically designated for homeless households. All Consortium agencies agree to coordinate their services with other providers for the benefit of their participants. Examples of these programs include the Department of Housing and Urban Development (HUD) public housing programs, Section 8 tenant assistance, Supportive Housing for Persons with Disabilities, HOME, Temporary Assistance for Needy Families, Medicaid, Badger Care, public school districts, Head Start, Social Security, Social Security Disability, Social Security Disability Insurance, and Food Share.

SECTION I: GENERAL REQUIREMENTS

1. PROGRAM STANDARDS

1. In providing or arranging for housing, shelter or services, the program considers the needs of the household experiencing or at-risk of homelessness taking into account client choice.
2. The program provides assistance in accessing suitable housing.
3. The program is aligned with the community goals to prevent and end homelessness.
4. The Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT), Vulnerability Index & Family Service Prioritization Decision Assistance Tool (VI-F-SPDAT), or Transition Age Youth-Vulnerability Index & Service Prioritization Decision Assistance Tool (TAY-VI-SPDAT) will be used when screening households for Permanent Supportive Housing and Rapid Re-housing programs. The latest version will be posted on the Homeless Services Consortium website.
5. Each shelter and housing case management program serving households with children must be aware of and inform households of the educational rights of children and unaccompanied youth in their programs, under the McKinney Vento Act. Program staff will facilitate the connection of households with their school's homeless liaisons, such as the MMSD Transition Education Program, to ensure seamless school enrollment and transportation arrangements. Program staff will highly encourage school attendance and will work with households and school staff to address any barriers to achieving academic success.
6. Each program in the CoC will provide accurate and up-to-date information on eligibility criteria for the program; e.g. – gender specific, individuals/families. Each agency will provide information to Coordinated Entry.
7. Each housing and housing case management program in the CoC will use the Mainstream Benefits Checklist. This checklist should be kept in the file for each household and updated annually.
8. Each program will make language translation service available for clients when needed by utilizing available services, such as a language line.
9. All ES, TH, PSH, RRH, and other PH providers must provide information for Housing Inventory Chart (HIC) and Point in Time (PIT) as requested by the CoC or its designee.

2. CASE MANAGEMENT SERVICES

MINIMUM STANDARDS

1. The frequency of case management services will vary based on program participant need. Initial contacts with the participant will typically be at least weekly and continued contacts will be at least monthly. In-person contact is preferred whenever possible.
2. Case management services include, but are not limited to: developing an individualized housing/service plan, assistance with obtaining and maintaining housing, counseling, employment referrals, education, referral and coordination of services, accessing mainstream benefits, and coordinating with schools.

3. Case management service plans will incorporate the participants' expectations and choices for short and long-term goals.
4. Together, the program and program participants will develop a schedule for reassessing the individualized service plan. The reassessments will occur at least annually, and as often as required by the funder.

3. PERSONNEL

All programs shall be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

MINIMUM STANDARDS

1. The agency selects, for its service staff, only those employees and/or volunteers with appropriate knowledge, or experience, for working with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
2. The program provides training to all paid and volunteer staff on both the policies and procedures employed by the program and on specific skill areas as determined by the program.
3. All paid and volunteer service staff participates in ongoing and/or external training and development to further enhance their knowledge and ability to work with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability. Examples of training topics include, but are not limited to, harm reduction, trauma informed care, housing first and racial justice.
4. For programs that use HMIS, all HMIS users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
5. Agency staff with responsibilities for supervision of the casework, counseling, and/or case management components have, at a minimum, a bachelor's degree in a human service-related field and/or experience working with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
6. Staff with supervisory responsibilities for overall program operations shall have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
7. All staff has a written job description that, at a minimum, addresses the major tasks to be performed and the qualifications required for the position.
8. The program operates under affirmative action and civil rights compliance plans or letters of assurance.
9. Case supervisors review current cases and individual service plans on a regular and consistent basis to ensure quality, coordinated services.

4. HOUSING FIRST

Housing First is a proven method of ending all types of homelessness, and is the most effective approach to ending chronic homelessness. Housing First offers individuals and families experiencing homelessness immediate access to permanent affordable or supportive housing, without clinical prerequisites like completion of a course of treatment or evidence of sobriety and with a low-threshold for entry. Housing First permanent supportive housing models are typically designed for individuals or families who have complex service needs, 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 rapid re-housing provide quick access to permanent housing through interim rental assistance and supportive services on a time-limited basis. Rapid re-housing programs are designed to have low barriers for program admission, and to serve individuals and families without consideration of past rental, credit or financial history. The Housing First approach has also 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.

SYSTEM-WIDE HOUSING FIRST ORIENTATION FOR THE HOMELESS SERVICES CONSORTIUM

- Emergency shelter, street outreach providers, and other parts of crisis response system are aligned with Housing First and recognize their roles to encompass housing advocacy and rapid connection to permanent housing. Staff in crisis response system services operate under the philosophy that all people experiencing homelessness are housing ready.
- Strong and direct referral linkages and relationships exist between crisis response system (emergency shelters, street outreach, etc.) and rapid re-housing and permanent supportive housing. Crisis response providers are aware and trained in how to assist people experiencing homelessness to apply for and obtain permanent housing.
- The HSC has a streamlined and user-friendly community-wide process for applying for rapid re-housing, permanent supportive housing and/or other housing interventions. The process includes the use of standardized eligibility forms.
- The HSC has a coordinated entry system for matching people experiencing homelessness to the most appropriate housing and services based on participant choices.
- The HSC has a data-driven approach to prioritizing highest need cases for housing assistance whether through analysis of lengths of stay in Homeless Management Information Systems, vulnerability indices, or data on utilization of crisis services.
- Policymakers, funders, and providers collaboratively conduct planning and raise and align resources to increase the availability of affordable and supportive housing and to ensure that a range of affordable and supportive housing options and models are available to maximize housing choice among people experiencing homelessness.
- Policies and regulations related to permanent supportive housing, social and health services, benefit and entitlement programs, and other essential services, support and do not inhibit the implementation of the Housing First approach. For instance, eligibility and screening policies for benefit and entitlement programs or housing do not require the completion of treatment or achievement of sobriety as a prerequisite.

MINIMUM STANDARDS

1. Program admission/tenant screening and selection practices promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, and participation in services.
2. Applicants are not rejected on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that indicate a lack of “housing readiness.” Although applicants may be rejected due to convictions for violent criminal activity, agencies will make all effort possible to remove barriers to program enrollment. A rejection is only appropriate when an applicant presents a direct threat to the health and safety of program staff and residents and that threat cannot be ameliorated.
3. Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly tenant-driven without predetermined goals. Participation in services or program compliance is not a condition of permanent supportive housing tenancy. Rapid re-housing programs may require case management as condition of receiving rental assistance as required by state or federal funding.
4. Use of alcohol or drugs in and of itself (without other lease violations) is not considered a reason for eviction. Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of tenants’ lives, where tenants are engaged in non-judgmental communication regarding drug and alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.
5. If a participant’s tenancy is in jeopardy, every effort is made to offer a transfer to a tenant from one housing situation to another. Whenever possible, eviction back into homelessness is avoided. If unavoidable, every effort is made to connect the participant with outreach or other housing support services.
6. Tenant selection plan for permanent housing includes a prioritization of eligible tenants based on criteria other than “first come/first serve” such as duration/chronicity of homelessness, vulnerability, or high utilization of crisis services.
7. Tenants in permanent housing are given reasonable flexibility in paying their tenant share of rent (after subsidy) on time and are offered special payment arrangements (e.g. a payment plan) for rent arrears and/or assistance with financial management including representative payee arrangements.

RECOMMENDED PROGRAM PRACTICES

1. Tenants are not required to have income for program eligibility.
2. Case managers/service coordinators are trained in and actively employ evidence-based and best practices for client/tenant engagement such as Motivational Interviewing (MI), Critical Time Intervention (CTI), client-centered care, and trauma-informed care. Agencies are recommended to participate in any trainings provided by the HSC.
3. Building and apartment units may include special physical features that accommodate disabilities, reduce harm, and promote health among tenants. These may include elevators, stovetops with automatic shut-offs, wall-mounted emergency pull-cords, ADA wheelchair compliant showers, soundproofing cushions, etc.
4. In the event a provider seeks to terminate services and/or evict a program participant, a notice of termination shall include information of local legal services providers.

PROGRAM EVALUATION FOR HOUSING FIRST¹

In an effort to move to a system-wide orientation to ending homelessness through the use of Housing First principles, the HSC has included the following section to review agency and program adoption of Housing First. Agencies and programs should follow the guidelines below. The guidelines have been created to minimize as many barriers to housing as 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. The HSC Board will conduct an annual Housing First evaluation to inform funding decisions.

The guidelines set forth under this section have been created by the HSC in an effort to promote agency-to-agency review and technical assistance within the HSC for all community programs. All review conducted under this section will be conducted internally by the HSC.

1. Does the project provide and explain the written eligibility criteria, which are in line with the Housing First philosophy, to participants?
2. Does the project have admission/tenant screening and selection practices that promote the acceptance of applicants regardless of their sobriety, use of substances, completion of treatment, or participation in services?
3. Does the project accept participants who are diagnosed with or show symptoms of a mental illness?
4. Does the project have and follow a written policy for the following:
 - a. Stating that taking psychiatric medication and/or treatment compliance for mental illness is not a requirement for entry into or continued participation in the project?
 - b. Not rejecting participants based on previous criminal history that is not relevant to participation in the program, and accepting participants regardless of minor criminal convictions to the project?
 - c. Not rejecting participants based on prior rental history or past evictions to the project?
 - d. Accepting participants regardless of lack of financial resources to the project, unless program operation is dependent upon participant income?
 - e. Accepting participants regardless of past non-violent rule infractions within the agency's own program and/or in other previous housing programs to the project?
5. Upon entry to the project, the project agrees to allow participants to remain in the project even if they require an absence of 90 days or less due to the reasons outlined below, unless otherwise prohibited by law or funder policy:
 - a. Substance use treatment intervention
 - b. Mental health treatment intervention
 - c. Hospitalization and short-term rehabilitation
 - d. Incarceration
 - e. Or other reason approved by the program supervisor

¹ Program Evaluation taken from:

<http://www.allchicago.org/sites/allchicago.org/files/2015%20Project%20Component%20-%20FINAL.pdf>

5. EMERGENCY TRANSFER PLAN

The Continuum of Care is required to have an Emergency Transfer Plan in place in cases of domestic violence, dating violence, sexual assault, or stalking where a household deems their current unit an unsafe living situation. A victim may request an emergency transfer from their current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. Providers shall make their plan available upon request and publicly post the Emergency Transfer Plan on its website and in a conspicuous location on its premises 24 CFR 5.2005 (e)(11).

ELIGIBILITY CRITERIA

- A victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer if: 24 CFR 5.2005(e)(2)
 - The tenant requests the transfer; and
 - The tenant 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
 - In cases of sexual assault when:
 - the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains in their current unit, or
 - the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.
- Requests for an emergency transfer can be either written or verbal. If a verbal request is made, staff shall document the request in writing.
- In cases of two-adult households where the participant asked to leave was the eligible participant for the housing program, the remaining participant(s) who were not already eligible will have a period of 90 calendar days from the date of the eligible participant leaving to:
 - Establish eligibility for the housing program
 - Establish eligibility for another housing program
 - If not eligible for a housing program, a provider or agency will assist with finding alternative housing.

Agencies may extend this period up to an additional 60 calendar days if needed. Case management staff will help to obtain documentation. The provider shall give written notice to the remaining participant of the remaining participant's rights under this section, including the right to an extension. Denials of extensions shall be subject to the provider's grievance process. 24 CFR 5.2009
- For permanent supportive housing projects, members of any household who were living in an assisted unit at the time of a qualifying member's eviction from the unit because the qualifying member was found to have engaged in criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking, have the right to rental assistance until the expiration of the lease in effect at the time of the qualifying member's eviction. 24 CFR 578.75(j)
- Although every effort will be made to keep the person requesting the emergency transfer in the program, there is no guarantee that continued assistance will be available in the current program or in other program housing.

MINIMUM STANDARDS

1. Persons may not be denied assistance, terminated from assistance or evicted as a result directly related to experiencing domestic violence, dating violence, sexual assault, or stalking, regardless of sex, gender identity, gender expression or actual or perceived sexual orientation, if the person otherwise qualifies for the project. 24 CFR 5.2005(b)(1)
2. Program participants may not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking if:
 - a. The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, and
 - b. The tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking. (24 CFR 5.2005(b)(2))
3. The Notice of Occupancy Rights under the Violence Against Women Act (HUD Form 5380) and Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation (HUD Form 5382) must be provided to program applicants/participants (in the language they request) when they are accepted or denied transitional or permanent housing, served an eviction notice or terminated from assistance. CoC and ESG program grantees must document that participants were informed of their rights and provided copies of the notices. A signed copy of acknowledgement must be maintained in client files. If person refuses or is unable to sign, provider will document provision of forms and attempt to get signature. For applicants who do not become participants, providers must keep files of signed documents for three years. 24 CFR 5.2005 (a)(1)(2)(3)
4. When a housing provider is entering into a lease agreement with a participant, they must include the VAWA Lease Addendum (HUD Form 91067) which is to be signed by both the tenant and the housing provider.
5. CoC and ESG-funded programs using funds for rental assistance are required to include VAWA notification and confidentiality requirements in a contract with the owner or manager of the housing unit(s). The program must ensure that the owner or manager of the housing provides HUD forms 5380 and 5382 to the program participant with any notification of eviction. (24 CFR 578.99(j) (4)(5))
6. All information regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is or has experienced such violence or staking, must be kept confidential. This includes keeping confidential the new location of the unit of the program participant. Confidentiality also means that providers and/or property owners or managers may not:
 - a. Enter the information into any shared database except the authorized DV comparable database;
 - b. Allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work; or
 - c. Provide the information to any other entity or individual, except to the extent that the disclosure is:
 - i. Requested or consented by the individual, in writing stating permission to release the information on a time-limited basis;
 - ii. Required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program; or
 - iii. Otherwise required by applicable law

- d. If program disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the program will inform the victim before disclosure occurs so that safety risks can be identified and addressed. 24 CFR 5.2005 (e)(4)
7. Upon request for an emergency transfer, the housing provider must establish an individualized plan with the tenant and provide a copy of the plan to the tenant in writing. The housing provider will offer to assist participants in contacting local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.
8. Program staff must complete an immediate initial emergency transfer if a safe unit can be identified. The participant will move to the new unit without having to undergo an application process. Program staff will assist participants in planning for the move and establishing residency in new location. 24 CFR 5.2005(e)(5)(6)
9. If a participant must move outside of the current project to locate a safe unit, the program staff must communicate with the Coordinated Entry Manager to complete an external emergency transfer. The participant will move to another unit as soon as a unit is identified as available, and on its face, it appears that the tenant is eligible. The applicant will subsequently undergo an application process in order to establish permanent residency in the new unit. 24 CFR 5.2005 (e)(7)
10. Program participants requesting an emergency transfer will be prioritized above any other households for open units. 24 CFR 5.2005 (e)(3)
11. The program participant will make a decision on whether or not a unit qualifies as a safe unit.
12. Program participants may request an external emergency transfer. Participants may also request both an internal and external transfer at the same time in order to speed up the process of identifying a new unit. 24 CFR 5.2005(e)(7)(8)
13. Agencies participating in Coordinated Entry must accept emergency transfers as they have available units that are deemed safe. 24 CFR 5.2005(e)(7)
14. Program staff will work together to ensure a timely transfer to a new safe unit, ideally within 60 days. If needed, the participant may seek shelter while a permanent safe unit is being secured.
15. For families receiving tenant-based rental assistance, if the family separates in order to affect an emergency transfer, the housing provider must work with the members requesting a transfer to locate new housing *and* with the family members exiting from the program on housing stability. This may include working with the landlord so the family can stay in the unit or work towards a mutual lease termination. The housing provider will conduct a housing search with the family members for 90 days and if not housed, connect to another provider for ongoing assistance. 24 CFR 5.2005(e)(9)
16. **Housing providers are not required to request documentation.** However, the housing provider, at its discretion, may make a written request for documentation from the tenant of the occurrence of domestic violence, dating violence, sexual assault, or stalking for which the emergency transfer is requested. Housing provider's policies must include their policy for requesting documentation, if they choose to request documentation. The policy must be consistent with these standards and equally applied to all participants. Should the housing provider exercise its discretion to request documentation, it shall do so in writing. The written request shall inform the tenant of the types of additional documentation that may be provided, any one of which would be acceptable, and the period of time by which the documentation is to be provided. The period of time shall be no less than 14 days and may be extended by the provider. This documentation may include:
 - a. Certification Form (see Appendix)

- b. A document:
 - i. Signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking or the effects of abuse;
 - ii. Signed by the applicant or tenant; and
 - iii. That specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking (see glossary); or
- c. A record of a Federal, State, tribal or territorial or local law enforcement agency, court or administrative agency; or
- d. A statement or other evidence provided by the applicant or tenant.

If the housing provider receives documentation that contains conflicting information, the housing provider may require third-party documentation be obtained within thirty days of the request for third-party documentation. Conflicting information cannot be the result of the housing provider’s own personal biases or stereotypes about survivors. The housing provider may deny the emergency transfer request if documentation has not been provided. Participants are entitled to written notice of denials of emergency transfer requests that include specific grounds for denial, information on their right to grieve the denial, and a copy of the grievance process. 24 CFR 5.2007

- 17. Housing providers cannot place a limit on the number of emergency transfer requests made by a participant.
- 18. Housing providers must keep a record of all emergency transfers requested under this plan and the outcomes of such requests, and retain these records for a period of three years, or for a period of time specified in program regulations. Requests and outcomes of such requests must be reported to HUD and the CoC Board of Directors annually. 24 CFR 5.2005(e)(12)

6. TERMINATION AND GRIEVANCE PROCEDURES

MINIMUM STANDARDS

1. Programs should terminate assistance only in the most severe cases, utilizing the housing first philosophy.
2. All agencies providing services with CoC and ESG funds shall be required to have a termination and grievance policy. Policies must allow an applicant to formally dispute an agency decision on eligibility to receive assistance. The policy must include the method an applicant would be made aware of the agency’s grievance procedure and the formal process for review and resolution of the grievance.
3. All agencies must have policies that allow a program participant to formally dispute an agency decision to *terminate assistance*. The policy must include the method that a written notice would be provided containing clear statement of reason(s) for termination, which shall include a detailed statement of facts, the source of the information upon which it was based, and the participant’s right to advance review of the agency’s file and all evidence upon which the decision was based; a review of the decision in which the program participant is given the opportunity to present evidence

(written or orally) before a person other than the person who made or approved the termination decision; and a prompt written notice of the final decision to the program participant. The agency has the burden to prove the basis for their decision by a preponderance of the evidence. The decision shall not be based solely on hearsay.

4. If an agency has a website, they must publicly post their termination and grievance procedures.
5. See the Emergency Shelter section for details on how these programs should handle termination and grievances.
6. Nothing in this section shall prevent an agency from reinstating services pursuant to applicable law.

7. PROGRAM TRANSFER

MINIMUM STANDARDS

1. Permanent Supportive Housing and Rapid Rehousing programs may consider transferring a program participant to another program for the reasons listed below. Approved transfer requests will be prioritized for program openings using the following order of prioritization:
 - i. Emergency transfer requests (VAWA)
 - ii. ADA requests for an accessible unit
 - iii. Changes in household composition
 - iv. Within 60 days of program termination (participant closest to program termination will be prioritized within this category)
2. Transfers are not guaranteed. Transfers may be limited by the availability of permanent housing placement options and the funding and program eligibility requirements of the program accepting the transfer request. For example, evidence of chronic homelessness prior to enrollment in the transferring housing program may be required for eligibility into the accepting housing program. Additionally, not all RRH programs are allowed to accept transfer requests per the limitations of the program funding requirements.
3. To initiate a program transfer, housing program staff must complete a Transfer Request Form (Appendix E) and submit it to the Coordinated Entry Manager. If applicable, chronic homeless documentation must also be submitted. Requests will be reviewed to determine if they fall under one of the allowable reasons listed above.
4. Approved transfer requests will be added to a list maintained by the Coordinated Entry Manager. Requests will remain active on the transfer request list for a period of 90 days, at which time the transferring housing program must submit a new Transfer Request Form to the Coordinated Entry Manager. If a new form is not received, the participant will be removed from the transfer request list and will no longer be considered for a program transfer.
5. Approved transfer requests may be discussed at an appropriate housing placement or case conferencing meeting. Discussion of housing options will be participant-centered.

8. RECORD KEEPING REQUIREMENTS

Agencies are responsible for knowing the reporting requirements for each funder and program. Documentation for the effective 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 a 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.

2. When required by funders, client information must be entered into HMIS in accordance with the data quality, timeliness and additional requirements found in the HMIS Policies and Procedures manual. At a minimum, programs must record the date the client enters and exits the program, and update the client's information as changes occur.
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.
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 to release any client identifying data to be utilized for research, teaching and public interpretation.
5. Files must be saved for a minimum of six years after program discharge. It should be noted that different funders may have different record keeping requirements.

SECTION II: PROGRAM REQUIREMENTS

1. PREVENTION

Homelessness prevention assistance includes rental assistance and housing relocation and stabilization services necessary to prevent an individual or family from moving into an emergency shelter, the streets, or a place not meant for human habitation.

ELIGIBILITY CRITERIA

- Participants must meet one of the following categories of HUD's Homeless Definition under CFR §576.2, AND have an annual income at or below 30% of the county median income:
 - Category 2* (Imminent Risk of Homelessness)
 - Category 3 (Homeless Under Other Federal Statutes)
 - Category 4* (Fleeing/Attempting to Flee Violence, and not living in a place described in Category 1)

*Category 2 and category 4 participants must have no other residence AND lack the resources and support networks to obtain other permanent housing.

OR

Individuals and families who do not meet the definition of "homeless" under any of the categories established in the HUD Homeless Definition final rule, and are "at risk of homelessness" under the McKinney-Vento Act, may receive homeless prevention assistance.

- Participants must meet one of the three categories of HUD's At Risk of Homelessness Definition under CFR §576.2, AND have an annual income at or below 30% of county median income:
 - Category 1: An individual or family who:
 - Has an annual income below 30% of median family income for the area; AND
 - Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
 - Meets one of the following conditions:
 - Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
 - Is living in the home of another because of economic hardship; OR
 - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
 - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
 - Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
 - Is exiting a publicly funded institution or system of care; OR

- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan
- Category 2 (Children/youth who do not qualify as homeless under the homeless definition in §576.2 but qualify as homeless under another Federal statute)
- Category 3 (Children/youth and their families who do not qualify as homeless under the homeless definition in §576.2, but who do qualify as homeless under Section 725(2) of the McKinney-Vento Homeless Assistance Act)

PARTICIPANT PRIORITIZATION REQUIREMENTS FOR FINANCIAL ASSISTANCE

- All individuals and families must meet the minimum HUD requirements for eligibility for homeless prevention. Further, all participants must have experienced homelessness in an emergency shelter, safe haven or place not meant for human habitation at some point in their lives.

The HSC will use a shared prioritization scoring tool (see Appendix C) that will target participants with the most barriers to housing. This tool will be used for individuals and households that meet the initial eligibility requirements listed above. Participants with the highest score at the end of an agency’s intake period will be prioritized to receive financial assistance.

Program participants requesting an emergency transfer will be prioritized above any other households for open units. 24 CFR 5.2005(e)(3)

PARTICIPANT PRIORITIZATION REQUIREMENTS FOR PREVENTION SERVICES

- Agencies providing ESG or HPP-funded prevention services not tied to financial assistance must take referrals of eligible households from the Coordinated Entry prevention hub. Agencies may also take direct referrals from eligible households.
- If services cannot be provided to all eligible households requesting the services, the agency offering the services must administer the shared prioritization scoring tool (Appendix C) used for prevention financial assistance in order to determine who should be prioritized to receive services.
- Entities that conduct program monitoring must have protocols to review the referral and prioritization process to ensure agencies are either able to provide services to all eligible households or using the prioritization scoring tool to determine service priority.
- Program participants requesting an emergency transfer will be prioritized above any other households for open units. 24 CFR 5.2005(e)(3)
- Nothing in these standards shall be interpreted to require a legal services provider to act contrary to the Rules of Professional Conduct for Attorneys, as codified in Wisconsin Statutes and Supreme Court Rules.

MINIMUM STANDARDS FOR FINANCIAL ASSISTANCE

1. Financial assistance includes the following: one-time payment for up to 6 months of rent in arrears including any late fees, short-term rental assistance up to 3 months, medium-term rental assistance up to 24 months, rental application fees, security deposits equal to no more than 2 months’ rent, last month’s rent, utility deposits, utility payments up to 24 months, and moving costs (or otherwise directed by the funder). Agencies may set maximum length of financial assistance based on program design and funding capacity, not to exceed 24 months.

2. Households can only receive assistance once in a three-year period or otherwise directed by the funder.
3. Households in CoC –funded Permanent Supportive Housing (PSH) can receive financial assistance if the program receives rental assistance funding, where the tenant has a lease directly with the landlord. If the PSH program is leasing or operation, the household is not eligible for financial prevention assistance.
4. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing for at least 30 days. Prevention funds may be provided for 6 months of rental arrears not to exceed two months of Fair Market Rent for the unit type.
 - a. All clients are assessed to determine initial need and create a budget to outline planned need for assistance, including establishing a plan for housing stability for the next 30 days.
 - b. The HSC expects that agencies will use progressive engagement and households receive the minimum amount of assistance necessary to stabilize in housing.
5. If providing short-term rental assistance (more than a one-time payment of rental arrears), eligibility and types/amounts of assistance must be re-evaluated not less than once every 3 months. At a minimum, each re-evaluation must establish and document:
 - a. The program participant does not have an annual income that exceeds 30% of county median income.
 - b. The program participant lacks sufficient resources and support networks necessary to retain housing without prevention assistance.
 - c. Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
6. Financial assistance will be distributed in a way to ensure that programs have funds available throughout the grant period.
7. If providing ongoing rental assistance, projects will work with individual households to progress towards paying full rent. Rent includes the cost of rent and utilities as calculated using the utility allowance schedule. This may involve a scheduled tiering process where the household pays an increasing percentage of their income towards rent and the program pays less, a monthly household budget review to determine how much the household can pay or any other method that works for both the participant and the project. Financial assistance is available for households with zero income.
8. Projects must have written policies regarding the amount and duration of financial assistance which must be communicated to participants upon project entry.

MINIMUM STANDARDS FOR HOUSING RELOCATION AND STABILIZATION SERVICES

1. Housing Relocation and Stabilization Services include the following: housing search and placement, housing stability case management, mediation, legal services, and credit repair.
2. The total period for which program participants may receive the services must not exceed 24 months during any three-year period.

3. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.
4. Eligibility and types/amounts of assistance must be re-evaluated not less than once every 3 months. At a minimum, each re-evaluation must establish and document:
 - a. The program participant does not have an annual income that exceeds 30% of county median income.
 - b. The program participant lacks sufficient resources and support networks necessary to retain housing without prevention assistance.
5. Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
6. Homeless prevention participants receiving housing stability case management will be offered a meeting with a case manager not less than once per month to assist in ensuring long-term housing stability. Case managers and program managers are encouraged to provide more than the minimum required services through case management.

2. YOUTH SPECIFIC SYSTEM NAVIGATION (SUPPORTIVE SERVICES ONLY)

System Navigation (SSO) staff support youth from initial contact with the homelessness system through location of permanent housing and connection to ongoing services. System Navigation staff will work intensively with individuals to learn about their service needs and life goals, assist in developing an individualized plan for meeting their goals, remove barriers to accessing services and meet the specific needs of individuals seeking support, including connection to housing. These services will be low-barrier in order to provide the greatest amount of access and work towards eliminating disparities in our community.

ELIGIBILITY CRITERIA

- Participants must meet categories 1- Literally Homeless, 2- Imminent Risk of Homelessness, or 4- Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- Participants must be no older than 24 at the time of project entry. Once a participant is enrolled, there is no age limit and the participant will continue to be enrolled for up to the maximum allowed amount of time based on the project and participant's choice. For example, if someone enters the project at the age of 24, they can continue to receive services for up to the maximum allowed amount of time based on the project and participant's choice.
- *Serving Households Who Lack 3rd Party Documentation or Live in Unsafe Situations.* Youth aged 24 and under are not required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under the YHDP NOFO. Additionally, any youth-serving provider funded under the YHDP NOFO may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who are living in unsafe situations. HUD interprets "youth-serving provider" as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets "living in unsafe situations" as

having an unsafe primary nighttime residence and no safe alternative to that residence. This requirement supersedes any conflicting requirements under the YHDP NOFO, this appendix, the Act, or the CoC Program rule.

- Youth and young adult (YYA) referrals are generated through the CoC Coordinated Entry process to be piloted for youth-specific projects.

MINIMUM STANDARDS

1. Immediate Connection to System Navigation Staff: When a household is deemed eligible for supportive services, a system navigation staff member connects with the household to start housing planning for both immediate and permanent housing. Staff should connect with the household as quickly as possible, however specific guidance on the time frame can be found in the YYA-specific Coordinated Entry policy.
2. The maximum period of assistance for Supportive Services is 24 months, beginning once the participant is enrolled in the project.
3. System Navigation staff will walk alongside and support project participants from initial contact with the system to location of permanent housing and connection to ongoing services.
4. Peer Mentors and Navigators will work as a System Navigation team, and work intensively with project participants to learn about their service needs and life goals, prioritize immediate needs for housing stability and secure services.
5. Services will include: Peer Mentors that are paired with Navigators to work as a team, transportation, and intensive case management to help the project participant connect with housing, services, and community support.
6. System Navigation Staff may continue working with and providing support for up to six months after the project participant exits homelessness.
7. Trauma Informed Care: The six key principles of trauma informed care are safety; trustworthiness and transparency; peer support; collaboration and mutuality; empowerment, voice and choice; and responsiveness to the impact of cultural, historical, and gender discrimination and oppression. Staff will use a trauma-informed approach in all aspects of working with the clients, from initial connection, to creating plans, and partnering with the young person. Staff and organizational partners will be trained and retrained on a regular basis in trauma-informed practices. Locations where young people are accessing Navigation Services should be trauma-informed physical spaces.
8. Positive Youth Development: Focuses on identifying and developing young people's resiliencies and assets, rather than concentrating on their risks and deficits. It centralizes the role of guidance and support from caring adults and their roles in helping youth to grow up healthy, happy, and safe and to make positive contributions to their (chosen) families, schools, and

communities. Community systems and programs that embrace PYD are **strengths-based, forward-looking, protective, preventive, and empowering**. The project will partner with young people to identify their own goals, explore options, and walk alongside the young person to connect to services and housing. Staff and partners will be trained in Positive Youth Development practices.

9. Housing First: The key to the Housing First philosophy is that individuals and families are not required to first demonstrate that they are “ready” for housing. Housing First for young people involves providing young people with assistance to obtain safe, secure, and permanent housing that meets their needs as quickly as possible, without preconditions. A right to housing with no preconditions means that housing and support are separated, therefore access to housing cannot be defined by conditions such as participation in programming where non-compliance leads to a loss of, or a denial of, access to housing.

3. STREET OUTREACH

Street outreach is a strategy aimed at engaging individuals experiencing unsheltered homelessness who may not be accessing community resources. The primary goal is to connect them with emergency shelter, housing, and other critical services. The essence of street outreach lies in its mobile, non-facility-based approach, enabling outreach staff to reach out to individuals where they are, dismantling barriers to access.

ELIGIBILITY CRITERIA

The following are the federal ESG grant-specific requirements regarding participant eligibility. If the program receives funding from other sources, please refer to the grant contract for specific regulations. Complying with additional requirements or flexibilities specified by other funding sources will not be regarded as a violation of the CoC’s written standards.

- Participants must be experiencing unsheltered homelessness, meaning an individual or family’s primary nighttime residence is a public or private place not designed for or ordinarily used as a regular sleeping accommodation, including a car, park, abandoned building, bus or train station, airport, or camping ground (CFR 576.2 (1)(i)).

Exceptions to Eligibility Criteria:

- In some cases, determining participant eligibility for street outreach may not be immediately feasible during the initial encounter with new individuals. As part of the engagement process, street outreach staff can offer services until eligibility (i.e. unsheltered homelessness) can be verified. It is important to note that individuals who are determined not to be experiencing unsheltered homelessness during the initial engagement period are no longer eligible for street outreach services.

- Recognizing that participants’ place of residence may change frequently and that the nature of effective street outreach is on creating meaningful relationship between the street outreach staff and the unsheltered participant, HUD specifies that street outreach case management can continue while participant is not unsheltered in the limited circumstances identified below:
 - o Program participant is already enrolled in the Street Outreach program; AND
 - o Program participant is not expected to remain in shelter, housing, or an institution for an extended period; AND
- o It would be reasonably expected that the participant will end up sleeping outside or in a place not suitable for human habitation upon exit of the shelter, housing, or an institution.

MINIMUM STANDARDS

1. Client-Centered Approach: Street outreach services embrace individual needs and choices. This entails:
 - a. Conducting individualized needs assessments
 - b. Informing participants about emergency shelters, temporary housing, and permanent housing options
 - c. Referring eligible participants to Coordinated Entry housing priority lists
 - d. Facilitating connections to preferred permanent housing solutions
 - e. Addressing immediate physical requirements (meals, clothing, etc.)
 - f. Assisting participants in accessing eligible mainstream benefits and resources.
2. Mobile Outreach Focus: Outreach efforts prioritize mobility, reaching participants on their terms, rather than expecting them to visit facilities.
3. Engagement: The engagement process is vital in street outreach, especially when individuals are initially unwilling or uncertain about seeking assistance. Building trust and rapport through persistent follow-ups and check-ins is essential, while respecting individual autonomy and choice. Coordination with other outreach teams should be explored if a person refuses engagement.
4. Long-Term Engagement and Participant Exit: Generally, outreach staff will remain committed to supporting individuals until they obtain permanent housing. Participants will be exited from the street outreach program when they have:
 - a. Secured permanent housing; or
 - b. Enrolled in other supportive services, such as CCS, CSP, and shelter case management services, and expressed no further desire to receive street outreach services. (Street outreach staff can continue to work with participants enrolled in other case management services if they meet the street outreach eligibility and wish to continue to work with street outreach.); or
 - c. Had no contact with outreach staff for a continuous period of 90 days, despite staff's efforts to connect.

5. Coordinated Entry Hub: Street outreach staff who use HMIS may become mobile hubs in the CoC's Coordinated Entry (CE) system. Initial certification and ongoing training is required to ensure competency in conducting CE assessments and referring participants to the CoC's CE housing priority lists.
6. Collaboration and Service Coordination: To enhance effectiveness and avoid duplication, street outreach teams actively participate in CoC's outreach case conferencing meetings and ensure timely HMIS entries. Refer to the most up-to-date [HUD ESG Program HMIS Manual](#), specifically the Street Outreach section.
7. Documentation and Eligibility: For chronically homeless individuals who are in the top 30 of the CoC's PSH list, street outreach teams working with the individuals will gather PSH eligibility documentation (i.e., history of homelessness and disability verification) and collect the Participant Interest Form. Completed documentation will be sent to the Coordinated Entry System Manager. For participants who are enrolled in both emergency shelter and street outreach, providers will collaborate to complete the documentation.

4. DIVERSION

Diversion² is a strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. Diversion specialists connect with people as they are requesting shelter or within 7-10 days of shelter entry. Diversion is not about keeping people out of the shelter system. It is about supporting self-resolution and should always be safe and appropriate according to the participant. Diversion services may include: short term case management; limited financial assistance; conflict mediation; connection to mainstream services/benefits; and housing search.

ELIGIBILITY CRITERIA

- A standard assessment tool is used to screen for diversion. See Appendix D for the Diversion Assessment Tool.

MINIMUM STANDARDS

1. Immediate Connection to Case Management: When a household is deemed eligible for diversion services, a case manager connects with the household to start housing planning for both immediate and permanent housing.
2. Resourceful Staff Members: Staff should be familiar with the intake and assessment processes, have experience with landlord mediation and conflict resolution, and be knowledgeable about rental subsidies and financial literacy programs.

² Diversion section taken from: National Alliance to End Homelessness, "Closing the Front Door: Creating a Successful Diversion Program for Homeless Families"

3. Screening Tool and Process: All households requesting shelter are screened for diversion eligibility using the Diversion Assessment Tool.
4. Flexible Funding: Funds should ensure households obtain housing, allow them to stay longer in a doubled up situation or unify them with family members.
5. Participant safety must be considered first. Participants decide what is safe and appropriate for themselves.
6. If a participant requests funds to relocate to another community, service providers must confirm they have housing in that community.
7. All participants who enter a diversion program must be entered into HMIS.

5. EMERGENCY SHELTER

Emergency shelter is any facility whose primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of people experiencing homelessness. Emergency shelters do not require occupants to sign leases or occupancy agreements.

ELIGIBILITY CRITERIA

Individuals and families defined as homeless under the following categories are eligible for assistance:

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 3: Homeless Under Other Federal Statutes
- Category 4: Fleeing/Attempting to Flee Domestic Violence

MINIMUM STANDARDS

1. Shelter staff and volunteers will treat guests with respect and dignity. Shelter policies and procedures will promote a welcoming, safe and non-intimidating environment for shelter guests and staff. These policies and procedures must be explained to applicants prior to entering shelter. In addition, they must be posted in the shelter and on the agency's website.
2. Shelters must conduct an initial evaluation to determine the eligibility of each household for shelter and the essential services the household needs to regain stability in permanent housing, such as case management, life skills training, child care, mental health services, education services, transportation, employment assistance and job training, legal services, and health services. Essential service needs must be regularly reassessed.
3. Shelters must provide risk assessment and safety planning with shelter guests who identify as victims of domestic violence, dating violence, sexual assault, and stalking. Referrals will be made to domestic violence resources as needed.
4. Supportive services are available to assist persons in obtaining housing either on-site or through a daytime resource center. All shelter guests are notified of the availability of support services and how to access these services.

5. Shelters in the CoC will assess eligibility for mainstream resources and refer guests to applicable resources. Shelters will document referrals using the Dane CoC Mainstream Benefits Checklist and/or case notes. Documentation must be kept in the file for each household.
6. Shelter operates every day of the year. In the event of a temporary shelter closure for rehabilitation or major maintenance work, as much notice as possible should be provided to guests, and efforts should be made to find a short-term replacement facility.
7. Each shelter will have a policy of respect for each individual's self-identified gender. Guests who request shelter services will be admitted to the shelter operated for the gender to which an individual identifies. Transgender and gender non-conforming guests will be offered the same services and resources as all other guests. While shelter staff will take reasonable steps to accommodate specific needs, it may not be possible to segregate the guest from the rest of the shelter population. Staff will not share or in any way advertise the fact that certain guests may have identified themselves as transgender or gender non-conforming. Staff will not segregate guests in sleeping and restroom spaces unless requested by the guest.
8. All households with children, regardless of age, gender identification, sexual orientation, or marital status who identify as a household will be served as such in family shelter. Households will not be separated when entering family shelter. There can be no inquiry, documentation requirement or "proof" related to family status, gender identification and/ or sexual orientation. The age and/or gender of a child under the age of 18 or, if over 18, enrolled in high school cannot be used as a basis for denying any family's admission to a program that uses ESG funding or services if those programs serve families with children under age 18.³
9. There is no charge to a shelter guest for emergency shelter.
10. Documentation (including Photo ID, birth certificate, etc.) is not a barrier to shelter.
11. The CoC does not prescribe a maximum length of stay. Agencies may establish the maximum length of stay based on project design and resources available. Length of stay policies must be communicated to shelter guests at intake.
12. Guests may be asked to leave for a period of time in the event of serious infraction and only in the most severe cases such as for behavior that is deemed seriously threatening or harmful to other guests and staff. Suspending a shelter guest is allowed only when all other options have been explored and a suspension is necessary to protect the health and safety of staff and guests. All shelter guests will be notified of the agency's grievance policy. When it is not possible to serve a guest because of the guest's behavior, efforts will be made by shelter staff to assist the guest in finding alternatives. See Dane County Ordinance 30.04 for details on the procedure for discontinuing shelter services to a guest.
13. Shelters are required to give notice of changes regarding access to the Homeless Services Consortium via hsc@cityofmadison.com. The Homeless Services Consortium's website will be updated to reflect the changes.

ACCESS TO SHELTER

³ From (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)

Information on how to access shelter can be found on the Homeless Services Consortium website (<https://www.danecountyhomeless.org/get-help>).

PRIORITIZATION FOR FAMILY SHELTER

Shelter is provided for households with children on a nightly basis. Priority is given to families with newborns (3 months and younger from May-October, 6 months and younger from November –April) and then to families who were denied the night before. As many families as possible are accommodated, based on space available. A factor that is accounted for is where the family sleeps when not accepted into EFS.

RECOMMENDED PROGRAM PRACTICES

Shelters will continue to work towards the following⁴:

1. **Housing First Approach:** Align shelter eligibility criteria, policies and practices with a Housing First approach so that anyone experiencing homelessness can access shelter without prerequisites, make services voluntary, and assist people to access permanent housing options as quickly as possible.
2. **Safe & Appropriate Diversion:** Provide diversion services to find safe and appropriate housing alternatives to entering shelter through problem-solving conversations, identifying community supports, and offering lighter touch solutions.
3. **Immediate & Low-barrier Access:** Ensure immediate and easy access to shelter by lowering barriers to entry and staying open 24/7. Eliminate sobriety and income requirements and other policies that make it difficult to enter shelter, stay in shelter, or access housing and income supports.
4. **Housing-focused, Rapid Exit Services:** Focus services in shelter on assisting people to access permanent housing options as quickly as possible.
5. **Data to Measure Performance:** Measure data on percentage of exits to housing, average length of stay in shelter, and returns to homelessness to evaluate the effectiveness of shelter and improve outcomes.

6. TRANSITIONAL HOUSING

Transitional Housing (TH) facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering TH. Programs will provide safe, affordable housing that meets participants' needs.

ELIGIBILITY CRITERIA

- Participants must meet categories 1 - Literally Homeless, 2 - At Imminent Risk, or 4 - Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- All TH program participants must fall into at least one of the categories below:
 - a. Individuals or head of household struggling with a substance use disorder
 - b. Individuals in early recovery from a substance use disorder who may desire more intensive support to achieve their recovery goals

⁴ National Alliance to End Homelessness: The Five Keys to Effective Emergency Shelter infographic

- c. Survivors of domestic violence or other forms of severe trauma who may require and prefer the security and onsite services provided in a congregate setting to other available housing options
- d. Unaccompanied and pregnant or parenting youth (age 18-24) who are unable to live independently or who prefer a congregate setting with access to a broad array of wraparound services to other available housing options
- e. Individuals listed on a sex offender registry
- f. People re-entering the community after a stay in jail or prison

MINIMUM STANDARDS

1. Maximum length of stay cannot exceed 24 months.
2. Staff must assist participants with creating a housing stabilization plan which may include the following: creating a housing history, completion of subsidized housing applications, repair credit history, make payment plans on past debts, increase income, create positive housing history in current place, and advocate with landlords as needed. Additional supportive services are provided as needed.
3. Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

7. PERMANENT SUPPORTIVE HOUSING

Permanent supportive housing (PSH) is defined by the following criteria:

- Affordable – Housing is subsidized to ensure fiscal sustainability of household
- Safe – Housing meets standards of habitability
- Low-barrier – No required preconditions to access housing
- Supportive – Household has indefinite access to client-driven supportive services that follow household through housing transitions
- Community-focused – Housing is integrated, to its greatest extent, into the surrounding community and services support household in connecting to and interacting with community

ELIGIBILITY CRITERIA

- Participants must meet categories 1- Literally Homeless or 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- PSH programs can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability
- PSH referrals are generated through the CoC Coordinated Entry process and the CoC-wide priority lists for families and individuals.

PARTICIPANT PRIORITIZATION REQUIREMENTS⁵

Participants will be prioritized based on their chronic homeless status, length of time homeless (capped at 36 months), and VI-SPDAT, VI-F-SPDAT, or TAY-VI-SPDAT score.

A. PRIORITIZATION FOR BEDS DEDICATED OR PRIORITIZED FOR PERSONS EXPERIENCING CHRONIC HOMELESSNESS

FIRST PRIORITY - Individuals and Families experiencing chronic homelessness with the Longest History of Homelessness and with the Most Severe Service Needs.

An individual or head of household experiencing chronic homelessness as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
- ii. The CoC or CoC program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs⁶.

SECOND PRIORITY - Individuals and Families experiencing chronic homelessness with the Longest History of Homelessness.

An individual or head of household experiencing chronic homelessness, as defined in 24 CFR 578.3, for which both of the following are true:

- i. The individual or head of household of a family experiencing chronic homelessness has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
- ii. The CoC or CoC program recipient has not identified the individual or the head of household experiencing chronic homelessness, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

⁵ CDP-14-012, *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status*, U.S. Department of Housing and Urban Development, July 28, 2014.

<http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf>. AND CPD-16-11, *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*, U.S. Department of Housing and Urban Development, July 25, 2016.

<https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

⁶ See Section I.D.3. of the HUD Notice for definition of severe service needs.

THIRD PRIORITY - Individuals and Families experiencing chronic homelessness with the Most Severe Service Needs.

An individual or head of household experiencing chronic homelessness as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The individual or head of household of a family experiencing chronic homelessness has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and
- ii. The CoC or CoC program recipient has identified the individual or the head of household experiencing chronic homelessness, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

FOURTH PRIORITY - All Other Individuals and Families experiencing chronic homelessness.

An individual or head of household experiencing chronic homelessness as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The individual or head of household of a family experiencing chronic homelessness has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least four separate occasions in the last three years, where the cumulative total length the four occasions is less than 12 months; and
- ii. The CoC or CoC program recipient has not identified the individual or the head of household experiencing chronic homelessness, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

B. PRIORITIZATION FOR BEDS NOT DEDICATED OR NOT PRIORITIZED FOR PEOPLE EXPERIENCING CHRONIC HOMELESSNESS

FIRST PRIORITY – Individuals and families experiencing homelessness with a Disability and Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

SECOND PRIORITY – Individuals and Families Experiencing Homelessness with a Disability with Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

THIRD PRIORITY – Individuals and Families Experiencing Homelessness with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

FOURTH PRIORITY – Individuals and Families Experiencing Homelessness with a Disability Coming from Transitional Housing

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

HOUSING PRIORITY LIST

Following the above prioritization requirements, the Housing Priority List will rank potential participants by chronic homeless status and number of points. The point formula considers a household's length of time homeless (capped at 36 months) and VI-SPDAT score. The number of points are determined by using the following calculation: (number of months of homelessness/12) + VI-SPDAT score = total points.

Further, people who have complete chronic documentation in place with the Coordinated Entry System Manager are prioritized for openings in PSH programs.

RECORD KEEPING REQUIREMENTS FOR DOCUMENTING CHRONIC HOMELESS STATUS⁷

1. Programs must have written intake procedures that establish the order of priority for obtaining evidence. The acceptable order of obtaining evidence as defined by HUD is:
 - i. third party documentation,
 - ii. intake worker observations, and
 - iii. certification from the person seeking assistance.

Records found in HMIS, including intake worker observations, are acceptable evidence of third-party documentation if there is a history of all entries including who entered the data, date of entry, and the change made AND if HMIS prevents overrides or changes of dates of entries made.

2. CoC-funded PSH programs whose grant agreement includes beds that are dedicated or prioritized for the chronic homeless must maintain records showing that those receiving assistance meet the

⁷ CDP-14-012, *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status*, U.S. Department of Housing and Urban Development, July 28, 2014.

<http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf> AND CPD-16-11, *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*, U.S. Department of Housing and Urban Development, July 25, 2016.

<https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

definition of chronically homeless. Records must include evidence of homeless status, duration of homelessness and documentation of disability.

A. EVIDENCE OF HOMELESS STATUS

Evidence of a household's current living situation may be documented by written observation of an outreach worker, written referral by housing or service provider or self-certification from the person seeking service that they are homeless and living in a place not meant for human habitation, an emergency shelter or a safe haven. For paragraph 2 of the definition for persons residing in an institution, acceptable evidence includes:

- i. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution that demonstrate the person resided there for less than 90 days. All oral statements must be recorded by the intake worker; or
- ii. Where the evidence above is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in the paragraph i. above and a certification by the individual seeking assistance that states that they are exiting or have just exited an institution where they resided for less than 90 days; and
- iii. Evidence that the individual was homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter, and met the criteria in paragraph (1) of the definition for chronically homeless in 24 CFR 578.3, immediately prior to entry into the institutional care facility.

B. EVIDENCE OF THE DURATION OF THE HOMELESSNESS

Recipients documenting chronically homeless status must also maintain the evidence described in paragraph i. or in paragraph ii. below, and the evidence described in paragraph iii. below:

- i. Evidence that the homeless occasion was continuous, for at least one year.

Recipients must provide evidence that the homeless occasion was continuous, for a year period, without a break in living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter. A break is considered at least seven or more consecutive nights not residing in a place not meant for human habitation, in shelter, or in a safe haven.

At least 9 months of the 1-year period must be documented by one of the following: (1) HMIS data, (2) a written referral, or (3) a written observation by an outreach worker. In only rare and the most extreme cases, HUD would allow a certification from the individual or head of household seeking assistance in place of third-party documentation for up to the entire period of homelessness. Where third-party evidence could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and evidence of the efforts made to obtain third-party evidence as well as documentation of the severity of the situation in which the individual or head of household has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area for more than 1 year and has not had any contact with anyone during that entire period.

Note: A single encounter with a homeless service provider on a single day within 1 month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month (e.g., evidence in HMIS of a stay in transitional housing).

- ii. Evidence that the household experienced at least four separate homeless occasions over 3 years that combined total at least 12 months.

The recipient must provide evidence that the head of household experienced at least four, separate, occasions of homelessness in the past 3 years that combined total at least 12 months.

Generally, at least three occasions must be documented by either: (1) HMIS data, (2) a written referral, or (3) a written observation. Any other occasion may be documented by a self-certification with no other supporting documentation.

In only rare and the most extreme cases, HUD will permit a certification from the individual or head of household seeking assistance in place of third-party documentation for the three occasions that must be documented by either: (1) HMIS data, (2) a written referral, or (3) a written observation. Where third-party evidence could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and must document efforts made to obtain third-party evidence, and document of the severity of the situation in which the individual has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area for more than one occasion of homelessness and has not had any contact with anyone during that period.

- iii. Evidence of diagnosis with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. Evidence of this criterion must include one of the following: (1) Written verification of the condition from a professional licensed by the state to diagnose and treat the condition; (2) Written verification from the Social Security Administration; (3) Copies of a disability check (e.g., Social Security Disability Insurance check or Veterans Disability Compensation); (4) Intake staff (or referral staff) observation that is confirmed by written verification of the condition from a professional licensed by the state to diagnose and treat the condition that is confirmed no later than 45 days of the application for assistance and accompanied with one of the types of evidence above; or (5) Other documentation approved by HUD
- iv. Evidence of Severe Service Needs: Evidence of score on VI-SPDAT, VI-F-SPDAT, or TAY-VI-SPDAT. This can be documentation found in HMIS. If a participant was brought into a program based on a medical exception, there must be case notes from the decision.
- v. Evidence that the recipient is following the CoC's Written Standards for Prioritizing Assistance: Order of prioritization must be incorporated into project's intake procedures and the project is following the procedures when accepting new program participants.
- vi. Evidence that there are no households meeting higher order of priority within the CoC's geographic area:

- a. If a dedicated and prioritized PSH project fills a vacancy with a person not experiencing chronic homelessness, there must be documentation showing that there were no households in the CoC experiencing chronic homelessness. Documentation should include evidence of outreach efforts undertaken to locate eligible households experiencing chronic homelessness. If there are people experiencing chronic homelessness, but have not accepted assistance, documentation should specify the number of persons that meet this criteria and the attempts that have been made to engage the individual or families.
- b. If a non-dedicated and non-prioritized PSH project serves a household who meets a lower order of priority, the project must document how the determination was made that there were no eligible households within the CoC's geographic area that met a higher priority.

MINIMUM STANDARDS

1. There can be no predetermined length of stay for a PSH project.
2. Supportive services designed to meet the needs of the project participants must be made available to the project participant throughout the duration of stay in the PSH project.
3. Project participants in PSH must enter into a lease agreement that is terminable for cause for an initial term of at least one year. The lease must be automatically renewable upon expiration for a minimum term of one month, except on prior notice by either party.
4. Turnover beds in PSH projects will be prioritized for chronically homeless participants.
5. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies and the project is required to keep the unit for the participant's return.
6. PSH project will use Housing First approaches. (See Section I: General Requirements, Housing First)

ACCESS TO PSH PROJECTS

All referrals for PSH projects will come through the coordinated entry system and the CoC-wide PSH priority lists for families and individuals.

8. RAPID RE-HOUSING

Rapid rehousing (RRH) is an intervention designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve stability in that housing. Rapid rehousing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are tailored to the unique needs of the household.

The core components of a rapid rehousing program are housing search and placement services, housing stabilization case management, short- and/or medium-term rental assistance and financial assistance. Program staff are expected to remain engaged with the households from first contact to program exit, using a progressive engagement approach and tailoring services to the needs of the household in order

to assist the household to maintain permanent housing. According to the National Alliance to End Homelessness, progressive engagement is,

“a person-centered approach to ending someone’s homelessness. It is based on tailoring assistance to each individual or household’s needs and assessing what works best for them, with their specific strengths, and in their specific situation.”

PRIORITIZATION

RRH referrals are generated through the CoC Coordinated Entry process and the CoC-wide priority lists for families and individuals. Participants are prioritized based on VI-SPDAT, VI-F-SPDAT or TAY VI-SPDAT score and length of time homeless (capped at 36 months). When filling program openings, participants are selected from the top of the non-chronic portion of the priority list. Program participants requesting an emergency transfer will be prioritized above any other households for open units (24 CFR 5.2005 (e)(3)).

MINIMUM STANDARDS

1. RRH projects will use Housing First approaches, following the Minimum Standards listed in the Housing First section of the Written Standards.
2. Upon project entry, RRH projects will assess participants for their needs for supportive services, including housing search and placement, housing stability case management, mediation, legal services, and credit repair.
3. Program staff will assist participants in locating housing for a minimum of 90 days. The frequency and level of housing search and placement assistance will vary based on program participant need. Initial contacts with the participant will typically be at least weekly and continued contacts will be at least monthly. In-person contact is preferred whenever possible.
4. Supportive services designed to meet the needs of the project participants must be made available throughout the duration of participation in the RRH project. If services such as mediation, legal services or credit repair is not provided by the project, staff will make appropriate referrals.
5. RRH programs will connect households with community resources and mainstream benefits to allow for individual resources to be used for housing costs.
6. Rental and financial assistance and services will be provided by using a progressive engagement approach. Assistance and services should be tailored to each individual household based on each household’s needs. See Appendix G for additional resources on progressive engagement.
7. In order to help households quickly stabilize in housing, projects may pay up to 100% of move-in costs including security deposit, first month rent, and any required utility payments, unless the funding source has a minimum participant payment requirement. If a household moves into housing between the 1st and the 15th of the month, that month will be considered the “first month”. If the household moves into housing between the 16th and the end of the month, the

following month will be considered the “first month.” In this situation, the program will provide 100% of the prorated rent in addition to the first month’s rent.

8. Following the first month, projects will work with individual households to progress towards paying full housing expenses (rent and utilities). This may involve a scheduled tiering process where the household pays an increasing percentage of their income toward rent and the program pays less, a monthly household budget review to determine how much the household can pay or any other method that works for both the participant and the project.
9. Agencies must have policies related to the program’s method of progressive engagement for financial assistance and services. Except for the maximum number of months the program participant receives assistance (24 months) and funding source specific requirements described in the chart below, the CoC does not prescribe maximum amount of assistance or maximum number of times that a program participant may receive assistance. However, agencies may set program specific limits in addition to those requirements.

Program policies and expectations must be communicated to project participants at program entry and must address the following:

Financial Assistance

- Maximum length of financial assistance
- Maximum amount of financial assistance, if any
- Type of financial assistance to be provided (e.g. security deposit, first month rent, monthly rental assistance, monthly utility assistance)
- (If security deposit was paid by the agency) what happens to security deposit at move out
- Proposed payment schedule, including participant and agency portions of rent, expected length of financial assistance
- Method used to adjust the payment schedule if needed

Services

- Required minimum frequency of case management meetings including housing search and placement and housing stabilization services, if any
- Maximum length of housing services including program extensions, if applicable

Different funding sources have varying participant eligibility criteria, eligible costs, and rental assistance requirements for Rapid Rehousing programs. A summarized overview of these variations can be found in the charts on the following pages. For more detailed information, please refer to the full regulations available for [ESG/HPP](#), [CoC](#), [TBRA](#) and [HAP](#) programs. (Note that State HAP funded programs must adhere to ESG/HPP requirements when utilizing HAP funds to match ESG funds.)

Recommended Program Practices:

For households that did not have chronic documentation completed prior to entering a Rapid Rehousing program but become chronically homeless during housing search before they become housed, it is

recommended that the Rapid Rehousing case manager document chronic homelessness. Completed documentation will be sent to the Coordinated Entry System Manager. Chronic homeless documentation is needed to be eligible for Permanent Supportive Housing in case Rapid Rehousing is not an appropriate level of intervention. See the Permanent Supportive Housing section for more information.

Participant Eligibility Criteria

	Initial Evaluation				Annual Re-Evaluation (On or before one-year mark)			
	ESG/HPP	CoC	HOME TBRA	State EHH-HAP	ESG/HPP	CoC	HOME TBRA	State EHH-HAP
Homeless Eligibility	Yes, see below for eligible categories	Yes, see below for eligible categories	Based on the Participating Jurisdiction (PJ) program design	Yes, see below for eligible categories	No**	No**	No**	No**
Category 1 Literally homeless -in emergency shelter and unsheltered, <i>not in TH</i>	✓	✓		✓				
Category 2 Imminent risk of homelessness	No	No, CoC funds allow but Dane CoC written standards do not		No, EHH funds allow but Dane CoC written standards do not				
Category 3 Homeless under other Federal statutes	No	No, CoC funds allow but CoC written standards and NOFOs do not		No, EHH funds allow but CoC written standards do not				
Category 4* Fleeing/attempting to flee domestic violence	✓*	✓*		✓*				

* Eligible only if also literally homeless

** Unless the household is still doing housing search at annual re-evaluation

	Initial Evaluation				Annual Re-Evaluation (On or before one-year mark)			
	ESG/HPP	CoC	HOME TBRA	State EHH- HAP	ESG/HPP	CoC	HOME TBRA	State EHH- HAP
Income Evaluation Required, based on County Median Income (CMI)	ESG- No, not at initial evaluation; only required at annual re-evaluation; HPP- Yes, at or below 80% CMI	No	Yes - Based on the PJ program design (can't be higher than 80% CMI and can be lower)	No	Yes – at or below 30% CMI	No	Yes - Based on the PJ program design (can't be higher than 80% CMI)	No, unless HAP funds are matched with ESG or HPP
Need (amount and type of assistance)	✓	✓			✓	✓		
Lacking Resources and Support Networks					✓	✓		

Eligible Costs

	ESG/HPP	CoC	HOME TBRA	State EHH-HAP
Maximum Length of Program Participation***	<ul style="list-style-type: none"> Up to 24 months of program participation, may be shorter depending on the agency program design Maximum number of months for rental assistance- not to exceed 24 months in a three-year period, including rental arrears 	<ul style="list-style-type: none"> Up to 24 months of rental assistance, may be shorter depending on the agency program design. Supportive services may be provided until 6 months after the rental assistance stops. 	<ul style="list-style-type: none"> Up to 24 months of program participation, may be shorter depending on the agency program design 	<ul style="list-style-type: none"> Up to 24 months of program participation, may be shorter depending on the agency program design
Rental Assistance	<ul style="list-style-type: none"> Short-term rental assistance (up to 3 months) Medium-term rental assistance (4 to 24 months) Rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears) 	<ul style="list-style-type: none"> Short-term rental assistance (up to 3 months) Medium-term rental assistance (4 to 24 months) 	<ul style="list-style-type: none"> Rental assistance for up to 24 months <p>*Rental assistance can be renewed depending on the funder program design and availability of funds</p> <p>*PJ must establish the payment standards, maximum amount of assistance</p>	<ul style="list-style-type: none"> Rental assistance up to 24 months (HAP does not have specific requirements, but Dane CoC Written Standards do) Rent arrears <p>*Participants must pay at least 25% of their gross income toward rent, including security deposit and first month's rent.</p>
Rental Assistance Type	<ul style="list-style-type: none"> Tenant-based rental assistance Project-based rental assistance 	<ul style="list-style-type: none"> Tenant-based rental assistance only 	<ul style="list-style-type: none"> Tenant-based rental assistance only 	<ul style="list-style-type: none"> Tenant-based rental assistance Project-based rental assistance

*** Except for the maximum number of months the program participant receives assistance described above, the CoC does not prescribe maximum amount of assistance or maximum number of times that a program participant may receive assistance. However, projects must set policies regarding a maximum amount of assistance or maximum number of times assistance is received.

	ESG/HPP	CoC	HOME TBRA	State EHH-HAP
Utilities	<ul style="list-style-type: none"> ● Utility deposits and payments*(up to 24 months) ● Utility arrears (up to 6 months) *Gas, electric, water/sewer are eligible; telephone, internet, and cable are not eligible *Utilities may only be provided if the participant has an account in their name with a utility company or proof of responsibility to make utility payments (cannot use utility allowance) 	<ul style="list-style-type: none"> ● Utility deposits and payments* *Gas, electric, water/sewer are eligible; telephone, internet, and cable are not eligible *Utility allowance is used 	<ul style="list-style-type: none"> ● Utility deposits and payments* *Gas, electric, water/sewer, trash are eligible; telephone, internet, and cable are not eligible *Only for participants who are receiving rental assistance are eligible to receive utility payments 	<ul style="list-style-type: none"> ● Utility deposits and payments ● Utility arrears *Gas, electric, water/sewer are eligible; telephone, internet, and cable are not eligible
Other Eligible Financial Assistance	<ul style="list-style-type: none"> ● Rental application fees ● Security deposits (up to 2 months) ● Last month's rent ● Moving costs 	<ul style="list-style-type: none"> ● Rental application fees, only paid under supportive services ● Security deposits (up to 2 months) ● First and last month's rent ● Property damage 	<ul style="list-style-type: none"> ● Security deposits (up to 2 months) 	<ul style="list-style-type: none"> ● Rental application fees ● Security deposits ● Utility deposits and payments (gas, electric, water, sewer) ● Utility arrearages (gas, electric, water, sewer) ● Moving costs
Supportive Services	<ul style="list-style-type: none"> ● Housing search and placement ● Housing stability case management 	<ul style="list-style-type: none"> ● Case management ● Child care ● Education services 	<ul style="list-style-type: none"> ● (TBRA funds cannot be used for supportive services. However, PJ may require providing 	<ul style="list-style-type: none"> ● Housing search and placement ● Housing stability case management

	<ul style="list-style-type: none"> • Mediation • Legal services • Credit repair 	<ul style="list-style-type: none"> • Employment assistance and job training • Food • Housing search and counseling services, including mediation, credit repair, and payment of rental application fee • Legal services • Life skills training • Mental health services • Moving costs • Outpatient health services • Outreach services • Substance abuse treatment services • Transportation 	supportive services with matching and leveraging funds.)	<ul style="list-style-type: none"> • Tenant/Landlord mediation • Legal services
<p>Frequency of Supportive Services *</p> <p>*Also see the case management services section (page 6-7) for minimum standards for case management services.</p>	Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability (§ 576.401(e)(i)).	Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month to assist the program participant in maintaining long-term housing stability (§ 578.37(a)(1)(ii)(F)).	No frequency requirement	No frequency requirement

Rental Assistance Requirements

	ESG /HPP	CoC	HOME TBRA	STATE EHH-HAP
Housing Standards	Units must meet HUD Habitability Standards, using the Habitability Standards Checklist	Units must meet HUD Housing Quality Standards (HQS), using HQS Inspection Form	Units must meet HUD Housing Quality Standards (HQS), using HQS Inspection Form	Units must meet HUD Habitability Standards, using the Habitability Standards Checklist
Fair Market Rent (FMR)	Rent must be at or below FMR	FMR is not required as long as rent reasonableness is documented	No specific FMR requirement, but PJ's rent standard may be tied to the FMR (e.g. 105% of FMR)	FMR is not required as long as rent reasonableness is documented
Rent Reasonableness	Must comply with HUD's rent reasonableness standards, using the Rent Reasonableness Form	Must comply with HUD's rent reasonableness standards, using the Rent Reasonableness Form	Must comply with HUD's rent reasonableness standards, using the Rent Reasonableness Form	Must comply with HUD's rent reasonableness standards, using the Rent Reasonableness Form
Lead Safety	Must follow <u>HUD's Lead Safe Housing Rule</u> . Use the HSC Lead Safe Housing Rule Form for required action and documentation.	Must follow <u>HUD's Lead Safe Housing Rule</u> . Use the HSC Lead Safe Housing Rule Form for required action and documentation.	Must follow <u>HUD's Lead Safe Housing Rule</u> . Use the HSC Lead Safe Housing Rule Form for required action and documentation.	Must follow <u>HUD's Lead Safe Housing Rule</u> . Use the HSC Lead Safe Housing Rule Form for required action and documentation.
Lease Standards	<ul style="list-style-type: none"> • Clients must have a legally binding lease. • "Master-leasing" is not allowed, meaning that agencies may not sign a lease and sublet the 	<ul style="list-style-type: none"> • Client must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of 	<ul style="list-style-type: none"> • Clients must have a legally binding lease. • "Master-leasing" is not allowed, meaning that agencies may not sign a lease and sublet the 	<ul style="list-style-type: none"> • Clients must have a legally binding lease. • Leases must include VAWA addendum. • Leases are <i>encouraged</i> to have

	<p>unit to a program participant. Leases must be between the owner and the client.</p> <ul style="list-style-type: none"> • Leases must include VAWA addendum. • Leases are <i>encouraged</i> to have an initial term of one year, but month-to-month lease is permitted for a scattered site model tenant-based rental assistance. (Project based rental assistance must have an initial term of one year.) 	<p>one month long, and is terminable only for cause.</p> <ul style="list-style-type: none"> • Leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. • Leases must include VAWA addendum. 	<p>unit to a program participant. Leases must be between the owner and the client.</p> <ul style="list-style-type: none"> • Leases must include VAWA addendum. • Leases must be for at least one year, unless the owner/manager and the tenant mutually agree to a shorter period. If the tenant has agreed to a different lease term, that agreement should be noted in writing in the tenant's file. A lease may not be for a period less than 30 days. 	<p>an initial term of one year, but month-to-month lease is permitted. Leases may be renewed or extended as needed for as long as a client remains eligible.</p>
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9. YOUTH-SPECIFIC JOINT TRANSITIONAL HOUSING – RAPID REHOUSING

Joint transitional - rapid rehousing projects provide a safe place for people to stay – crisis housing – with financial assistance and wrap-around supportive services determined by program participants to help them move to permanent housing as quickly as possible. Stays in the crisis housing portion of these projects should be brief and without preconditions, and participants should quickly move to permanent housing.

The project must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance or leasing and services provided through the TH-RRH component, to all program participants depending on each household's needs, for up to the maximum amount of time allowed under the funding source, as needed by the program participants. For example, a program participant may only need a temporary stay in a transitional housing unit, but the provider must be able to make available the financial assistance and supportive services that traditionally comes with rapid re-housing assistance to that program participant. After the participant exits the project, they may be provided up to 6 months of aftercare supportive services to help prevent returns to homelessness.

Youth-Specific Joint TH-RRH can consist of:

- Site-based TH paired with scattered-site RRH
 - When implementing this TH-RRH model, CoCs utilize a building in the community for the transitional housing portion of the project. When a youth or young adult in transitional housing has made clear that they are ready to move to permanent housing, project staff work with them to identify a unit in the community where they would like to be permanently housed and use the rapid rehousing portion of the project to assist the YYA.
- Scattered-site TH paired with scattered-site RRH (different unit)
 - When implementing this TH-RRH model, CoCs utilize scattered-site units in the community for the transitional housing portion of the project. A project may elect to use this model when it has a landlord partner in the community who is willing to rent their units for the TH portion, but the project wants to retain youth choice in the rapid rehousing portion and allow YYA to choose their unit within the community. When a youth or young adult has made clear that they are ready to transition to permanent housing using rapid rehousing assistance, project staff work with them to identify another unit in the community where they would like to be permanently housed.
- Scattered-site TH paired with scattered-site RRH (same unit)
 - When implementing this TH-RRH model, CoCs utilize scattered-site units in the community for the transitional housing portion. When a youth or young adult has made clear that they are ready to transition to permanent housing using rapid rehousing assistance, project staff work to transition the lease with the landlord to the youth or young adult.

For more information about Joint Transitional Housing - Rapid Rehousing please visit :
<https://files.hudexchange.info/resources/documents/YHDP-TH-RRH-Joint-Component-Project.pdf>

ELIGIBILITY CRITERIA

- Participants must meet categories 1- Literally Homeless, 2- Imminent Risk of Homelessness, or 4- Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- Participants must be no older than 24 at the time of project entry. Once a participant is enrolled, there is no age limit and the participant will continue to be enrolled for up to the maximum allowed amount of time based on the project and participant's choice. For example, if someone enters the project at the age of 24, they can continue to receive services for up to the maximum allowed amount of time based on the project and participant's choice.
- *Serving Households Who Lack 3rd Party Documentation or Live in Unsafe Situations.* Youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under the YHDP NOFO. Additionally, any youth-serving provider funded under the YHDP NOFO may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who are living in unsafe situations. HUD interprets “youth-serving provider” as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence. These requirements supersede any conflicting requirements under the YHDP NOFO, this appendix, the Act, or the CoC Program rule.
- YYA TH-RRH referrals are generated through the CoC Coordinated Entry process to be piloted for youth-specific projects.

MINIMUM STANDARDS

1. Immediate Connection to Housing Advocate and Peer Support staff: When a household is deemed eligible for TH-RRH services, a TH-RRH staff member connects with the household to start housing planning for both immediate and permanent housing. Staff should connect with the household as quickly as possible, however specific guidance on the time frame can be found in the YYA specific Coordinated Entry policy.
2. YYA should not be required to have income or obtain a source of income as part of the project requirements.
3. There is no minimum length of stay in the TH portion, but the project must offer an occupancy agreement of at least 1 month.
4. The maximum period of assistance is dependent on the funding source, and as needed by the program participants.
5. YYA do not have to utilize both portions of the project, and can reside in only the TH or only the RRH.
6. Service teams will include a peer support specialist and Housing Advocate (case manager.) YYA will lead the development of a service plan in order to ensure the program is working for them. YYA will be connected with crisis and permanent housing, develop community connections, and have self-determination and access to support services that meet their identified needs.
7. The TH-RRH staff will remove barriers for people experiencing homelessness by identifying and supporting landlords through networking with friendly/interested landlords and providing

financial incentives (i.e. deposits, etc.) as well as connections to supportive services for problem solving. It is also essential that the program proactively engages in enforcing Fair Housing & Anti-Discrimination Rules by reporting violations and advocating with enforcement agencies. TH-RRH staff will partner with cross-system agencies for intersecting needs (disability, LGBTQ+, racism, etc.). This will require education and continued training for young people to be aware of their rights, options, and how to advocate for themselves when needed.

8. Financial assistance and case management should be flexible and based on a household's individual needs using progressive engagement.
 - Financial Assistance:
 - a. In order to help households quickly stabilize in housing, projects may pay up to 100% of move-in costs including security deposit, first and last month's rent and any required utility payments. Projects are encouraged to also pay for furniture and furnishings for the rental unit, moving costs, relocation costs, and any other allowable costs based on the funding source.
 - b. If the provider cannot find another suitable project that meets the needs of the participant within the CoC and the participant wants to move, the provider may relocate the participant to a unit that is located in a different CoC's geographic area and continue to provide assistance. In this case, providers should check on specific requirements based on the project's funding source.
 - c. Following the first month, projects will work with participants to create an individualized plan for rental contributions. Rent includes the cost of rent and utilities as calculated using the utility allowance schedule. This may involve a scheduled tiering process where the household pays an increasing percentage of their income towards rent and the program pays less, a monthly household budget review to determine how much the household can pay or any other method that works for both the participant and the project.
 - d. Projects must have written policies regarding the amount and duration of financial assistance which must be communicated to participants upon project entry.
9. The TH-RRH staff will attempt to connect with participants on a monthly basis. Case management should be flexible and available more often if requested and needed. Connection is considered to be making an attempt to meet with or communicate with participants in person, over the phone, virtually or by text or email. The preferred method of communication should be determined by the participant. Non-response is not grounds for removal from the project or termination of supports. In the event of non-response, the TH-RRH staff should document their attempt for engagement in participant's files.
10. Trauma Informed Care: The six key principles of trauma informed care are safety; trustworthiness and transparency; peer support; collaboration and mutuality; empowerment, voice and choice; and responsiveness to the impact of cultural, historical, and gender discrimination and oppression. Staff will be competent in safety planning and practices, project policies and procedures will be designed with trauma-informed practices in mind at every stage of the connection with the client from referral, to eligibility documentation, and housing and service planning.
11. Positive Youth Development: Focuses on identifying and developing young people's resiliencies and assets, rather than concentrating on their risks and deficits. It centralizes the role of guidance and support from caring adults and their roles in helping youth to grow up healthy, happy, and safe and to make positive contributions to their (chosen) families, schools, and communities. Community systems and programs that embrace PYD are **strengths-based**,

forward-looking, protective, preventive, and empowering. The project will partner with young people to identify their own goals, explore options, and walk alongside the young person to connect to services and housing. Staff and partners will be trained in Positive Youth Development practices.

12. Housing First : The key to the Housing First philosophy is that individuals and families are not required to first demonstrate that they are “ready” for housing. Housing First for young people involves providing young people with assistance to obtain safe, secure, and permanent housing that meets their needs as quickly as possible, without preconditions. A right to housing with no preconditions means that housing and support are separated, therefore access to housing cannot be defined by conditions such as participation in programming where non-compliance leads to a loss of, or a denial of, access to housing. Projects should have low-barriers to entry and accommodate people with possessions, partners, pets, or other needs. Incorporate client-choice by helping participants find permanent housing based on their unique strengths, needs, preferences, and financial resources. Participants will choose when they are ready to exit the crisis housing portion of the project and move to permanent housing, with providers assisting participants with this move.

10. COORDINATED ENTRY

Coordinated Entry is an important process through which people experiencing or at risk of experiencing homelessness can access the crisis response system in a streamlined way, have their strengths and needs quickly assessed, and quickly connect to appropriate, tailored housing and mainstream services within the community or designated region. Standardized assessment tools and practices used within local coordinated assessment processes take into account the unique needs of single adults, households with minor children and unaccompanied youth. When possible, the assessment provides the ability for households to gain access to the best options to address their needs, incorporating participants’ choice, rather than being evaluated for a single program within the system. The most intensive interventions are prioritized for those with the highest needs.⁸

The Coordinated Entry (CE) policies and procedures are put in place by the Dane County Homeless Services Consortium to provide an effective Coordinated Entry System. The system is intended to match people in a housing crisis (either homeless or at-risk of homelessness) with the level of service needed to end the crisis and assist them in housing stability. All programs that receive Continuum of Care Program, Emergency Solutions Grant (ESG) or State of Wisconsin EHH Grant funding must abide by these policies and procedures. Programs funded through other sources may be required, and are highly encouraged to participate in CE and follow these policies and procedures.

Coordinated Entry responsibilities are completed at assessment hubs, which include both permanent and mobile locations. Coordinated Entry staff refers to staff paid through the CoC grant for Coordinated Entry.

ACCESS TO COORDINATED ENTRY

A. FULL COVERAGE

⁸ Opening Doors: Federal Strategic Plan to Prevent and End Homelessness, p. 57

The Coordinated Entry System is accessible throughout Dane County. Assessment hubs are located at The Salvation Army Single Women’s and Family Shelter, Porchlight Men’s Shelter and the CE office at The Beacon Day Resource Center. Participants can also access CE at The Beacon by calling 608-826-8019. Callers will not be required to present in the CE office. They will be assessed for immediate needs, and when possible, referrals will be given over the phone. The VI-SPDAT assessment should be conducted in person.

Street outreach workers serve as mobile hubs, and will seek out people sleeping in places not meant for human habitation or other locations that serve vulnerable populations that are not assessment hubs (i.e. Briarpatch, DAIS, Catholic Multicultural Center, etc.). Additionally, there are monthly mobile assessment hubs provided in areas surrounding the City of Madison. There will be assessment hubs located in geographically diverse sections of Dane County that will be visited as necessary to do VI-SPDATs and provide services.

The Homeless Services Consortium website has up-to-date information regarding access to Coordinated Entry: <https://www.danecountyhomeless.org/get-help>. Emergency shelter phone numbers can be accessed through the HSC website.

B. EMERGENCY SERVICES

All shelters will participate in Coordinated Entry. All shelters are highly encouraged to assess clients for appropriate permanent housing placement using the VI-SPDAT. If shelters cannot assess clients due to lack of shelter resources, shelters must refer clients to the Coordinated Entry System for assessment, and explain to clients the process of accessing housing programs. All shelters are required to notify clients about how to access Coordinated Entry.

C. NONDISCRIMINATION

The CE system, programs that receive CoC, EHH, or ESG funds, and other participating housing and supportive services must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws, including the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, national origin/ancestry, religion, sex, age, family/familial status, disability/handicap, actual or perceived sexual orientation, lawful source of income, gender identity, marital status, domestic abuse/sexual assault/stalking victims, military discharge status, physical appearance, political beliefs, student status, domestic partnership, tenant union association, genetic identity, citizenship status, Section 8 housing voucher participant, non-religion, and homelessness.
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance.
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin under any program receiving Federal financial assistance.
- Title II of the Americans with Disabilities Act prohibits public entities, which includes State and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs and activities, which include housing, and housing-related services such as housing search and referral assistance.

- Title III of the Americans with Disabilities Act prohibits private entities that own, lease and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

If Coordinated Entry participants feel they have been treated unfairly by a specific agency or representative of that agency due to any of the above reasons, they may file a complaint with the agency through the agency’s nondiscrimination complaint process. If after filing a complaint with an agency, the participant is not satisfied with the result, they may file a discrimination complaint with the City of Madison. Information on how to file a complaint can be found on the City of Madison’s website at <http://www.cityofmadison.com/civil-rights>. Information and complaint forms are available at assessment hubs. Assessment hubs will post information on how/where to file a complaint.

D. ACCESSIBILITY

Assessment hubs may be accessed by all people who are currently in Dane County, and are experiencing homelessness or are at risk of homelessness. People experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence may present at any of the assessment hubs for which they qualify as a target population and be assessed for housing. Referrals will be made to agencies who specialize in serving specific populations.

A participant who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking will not be denied access to the Coordinated Entry process. CE staff will work with survivors to create safe and confidential access to the CE process based on individual needs.

Coordinated Entry staff will provide regular office hours throughout the county to accommodate those in outlying areas. There will be assessment hubs located in geographically diverse sections of Dane County that will be visited as necessary to do VI-SPDATs and provide services. If a household needs to get to Madison for shelter services, staff will contact the CoC Coordinator to explore transportation options.

Auxiliary aids and appropriate services must be provided to ensure effective communication with individuals with disabilities. This will include providing information in accessible formats such as Braille, audio, large type, assistive listening devices and using Wisconsin Relay. Whenever these services are provided, Coordinated Entry staff must document the accessible format provided.

Assessment hubs must be accessible to individuals who use wheelchairs.

Services are accessible to individuals with Limited English Proficiency (LEP). When an individual needs services in a language other than English, every effort will be made to find a qualified person who speaks the needed language. If a qualified person is not available, then a language line will be used to communicate with the individual. Individuals needing language assistance will be served as they present. They will not be asked to wait for services.

E. MARKETING

A marketing plan will be created to target those who may be least likely to access services. Data will be used to identify and target marketing materials toward potentially underserved groups. Outreach workers act as mobile assessment hubs and engage with those who traditionally do not access services. Marketing materials will indicate that physical assessment hubs are accessible to those with disabilities, that accommodations will be made if requested, and language services are provided. Marketing materials will be provided in English and Spanish. Posters will contain the words “Lus Hmoob” to

indicate that Hmong speakers are available. In addition, marketing materials indicate that services are available to all people regardless of race, color, national origin/ancestry, religion, sex, age, family/familial status, disability/handicap, actual or perceived sexual orientation, lawful source of income, gender identity, marital status, domestic abuse/sexual assault/stalking victims, military discharge status, physical appearance, political beliefs, student status, domestic partnership, tenant union association, genetic identity, citizenship status, Section 8 housing voucher participant, non-religion, and homelessness.

The lead CE agency will develop and update marketing materials. Posters will be provided to area agencies and businesses that may serve people experiencing homelessness to display in prominent areas. In addition, business cards will be provided to agencies and businesses to distribute to consumers. Marketing materials will be reviewed at least annually and updated if necessary. Updated materials will be distributed to agencies and businesses.

All information regarding CE will be available on the HSC website. Up-to-date materials and information will be available via the Homeless Services Consortium website.

Additionally, CE staff will present to agencies who want information on how the CE System operates. Initial presentations will be provided to agencies identified by the Core Committee. Future presentations will be provided as requested or if major changes are implemented in the operation of CE.

ASSESSMENT

A. ASSESSMENT TOOL

In order to achieve fair, equitable and equal access to services in the community, staff at assessment hubs (including mobile hubs), will use the same assessment tool. The Dane County CoC uses the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT). The appropriate version of the tool will be used based on the population of the presenting household (single, family or youth). The VI-SPDAT assesses households based on history of housing and homelessness, risks, socialization and daily functioning and wellness.

B. ASSESSMENT PROCESS

When households present to CE, they will receive referrals to basic housing resources such as diversion services, housing location assistance, and/or case management. If the household has not self-resolved their housing situation in 7-10 days and fall into one of our community's priorities (see Written Standards, Permanent Supportive Housing, Participant Prioritization Requirements), they will be assessed using the appropriate VI-SPDAT tool and placed on the Housing Priority List. Staff will ensure that the person does not already have an assessment in the system. Households should only be placed on the priority list if they are currently staying in shelter or a place not meant for human habitation. Staff will double check HMIS to ensure that people are properly on or off the list as required, or are added back to the list. If CE staff are aware of a household who is staying in a place not meant for human habitation, staff must inform them of services at The Beacon, emergency shelters, and offer connection to an outreach worker. If the household would like connection to an outreach worker, CE staff must alert outreach staff of the person's location immediately. Outreach staff will make contact within 48 hours.

Staff should not provide households with their VI-SPDAT score. Staff can provide households information about the housing intervention for which they are recommended (for example, Permanent Supportive Housing or Rapid Rehousing) should the household inquire about their assessment.

When a household is referred to the Housing Priority List, the staff making the referral is responsible to follow-up with the household every 30-45 days (starting for all households added to the list after January 22, 2018). Follow-ups must be recorded in the “Coordinated Entry Referral Follow Up” section in the Assessments tab of the client profile in HMIS. Households that do not use emergency shelter or outreach services within the HSC for six months, will be removed from the priority list.

If a household presents as two adults with no minor children, a VI-SPDAT for Single Adults should be completed for each individual. Each individual should be referred to the singles list and it should be noted in HMIS who they would like to live with (under the “Housing Placement Meeting” section in the Assessments tab of the client profile in HMIS). When one person comes up on the Housing Priority List, the outreach worker or CE staff will check in with the person and their significant other individually to be sure they want to live together.

If an unaccompanied youth between the ages of 18 and 24 presents to CE, staff should complete the TAY-VI-SPDAT and refer them to the singles list six months prior to their eighteenth birthday. In addition, CE staff should provide a referral to Briarpatch Youth Services.

A household may be re-assessed with the VI-SPDAT if there is a major life change. A major life change includes, but is not limited to the following: change in household members, change in health status, and additional interactions with emergency services.

If a household re-enters homelessness after being permanently housed, they should be re-assessed.

A household may refuse to complete the assessment. If a household refuses to complete the VI-SPDAT assessment, CE and outreach staff must continue to work to engage with them. It is important to continue to learn and document their needs for appropriate housing/service provision. While working with the household to get further information, CE and outreach staff may make a referral to the Housing Priority List. However, households must complete a CE Release of Information in order to be referred to the Housing Priority List.

The Coordinated Entry assessment process does not screen out people due to perceived barriers to housing or services, including, but not limited to, too little or no income, active or a history of substance use, domestic violence history, resistance to receiving services, the type or extent of disability-related services or supports that are needed, history of evictions or poor credit, lease violations or history of not being a leaseholder, mental health issues, medical need, perceived ability to live independently or criminal history.

C. COORDINATED ENTRY RELEASE OF INFORMATION

Agencies participating in Coordinated Entry (i.e. accepting referrals from Coordinated Entry to fill housing vacancies and making referrals to the Coordinated Entry housing priority list) are listed on the Release of Information. Additional agencies may be added to the list if they assist in providing documentation of chronic homeless status or they can determine eligibility for mainstream housing benefits such as HUD-VASH or Section 8. If an agency would like to be added to the Release of Information, they should contact the Coordinated Entry Manager. The Coordinated Entry Manager will determine if it is appropriate to add the agency to the ROI based on their participation in Coordinated Entry and/or their involvement in providing chronic documentation on an ongoing basis. Agencies

should **not** be added to the Coordinated Entry Release of Information for one-time needs. In these instances, a separate release of information form should be used.

Agencies may be removed if they no longer participate in Coordinated Entry, have not provided chronic documentation in the past 12 months, or violate the Homeless Services Consortium of Dane County Case Conferencing Agreement. The release is reviewed biannually by the HSC Core Committee (recommended in June and December).

D. SAFETY PLANNING

During the assessment, if a household indicates that they are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or community violence, CE staff will work with them to create a safe and confidential space to access Coordinated Entry. Community violence is defined as exposure to intentional acts of interpersonal violence committed in public or private areas by individuals who are not intimately related to the victim. CE staff will make a referral and provide immediate access to connect to a victim services provider. Participants are able to access the domestic violence hotline by calling 800-747-4045. If a household ends up in shelter with a non-victim services provider, staff at the shelter will work on safety planning with the household including ensuring confidentiality and flexibility with regular procedures to ensure safety.

E. PARTICIPANT CHOICE

Members of the Dane County CoC understand that households know best their needs and wants. It is important as people are nearing the top of the Housing Priority List that providers have a sense of what the household wants. Households will be offered the Participant Interest Form to complete. The form must be uploaded in HMIS to be used for placement. Providers must not tell households where they are on the Housing Priority List because it is a fluid list, not a time-bound list. Providers cannot determine when a housing opportunity will become available for the household.

F. ASSESSOR TRAINING

The Coordinated Entry Manager is responsible for developing trainings about the Coordinated Entry System. Trainings may be offered live, but can be recorded and posted on the Homeless Services Consortium website.

Required training for new Coordinated Entry staff includes:

- HMIS Licensure
- Coordinated Entry Policies and Procedures and Written Standards
- How to Conduct the Coordinated Entry Assessment in HMIS
- How to Initiate the Referral Process in HMIS
- How to Conduct/Enter the VI-SPDAT
- Best Practices for Engagements with Families
- Fair Housing Laws in Dane County
- HUD's Equal Access Rule
- Cultural and Linguistic Competency
- Trauma Informed Care
- Harm Reduction
- Client Confidentiality

- Housing First
- Domestic Violence 101 and Safety Planning

Required training for participating agencies of the Coordinated Entry System includes:

- HMIS Licensure
- Coordinated Entry Policies and Procedures and Written Standards
- How to Accept a Referral in HMIS

Ongoing trainings will be developed based on the needs of the CoC. The CE Manager will seek input from the Core Committee and the CoC Board on needed trainings.

Training protocols will be updated and distributed annually. The Coordinated Entry Manager will review the protocols and receive feedback from the Core Committee.

PRIORITIZATION

Data collected during the assessment process is not used to discriminate or prioritize households for housing and services on the basis of a protected class (see nondiscrimination section).

The Dane County CoC prioritizes Permanent Supportive Housing and Rapid Rehousing for the most vulnerable populations in our community. Households who are experiencing Category 1 – Literally Homeless or Category 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness may be placed on the Housing Priority List. Households placed on the list will be prioritized based on chronic homeless status, length of time homeless (capped at 36 months) and VI-SPDAT score (HUD Notice CPD-14-012). There is one priority list for single adults and one for families with minor children.

People who are experiencing Category 1 or Category 4 homelessness and refuse or are unable to complete the VI-SPDAT may still be referred to the Housing Priority List. If participants refuse or are unable to complete the VI-SPDAT, their prioritization on the list may be affected.

Households may receive a lesser intervention than their score. For example, a household may have a score in the PSH range, but if there are not PSH units available, the household may be offered a Rapid Rehousing intervention if applicable. The purpose is to move households from homelessness to housing as quickly as possible.

When a household is eligible for Homeless Prevention Funds, they will be prioritized using the Prevention Scoring Tool (see Appendix C). The tool considers the following factors in prioritization:

- Eviction process
- Lives in subsidized housing
- Eviction history
- History of homelessness
- Criminal history
- Disability/Needs accessible unit
- Household of five or more members

Entrance to emergency shelter will not be prioritized in order to allow for an immediate crisis response.

Prioritization policies will be made publicly available via the CoC's website and notices placed at assessment hubs.

Please note that eligibility (see Assessment section) and prioritization are different. A household may be prioritized for an intervention, but they still must meet eligibility for that intervention.

REFERRAL

A. HOUSING PLACEMENT MEETINGS

There is a Housing Placement meeting for Families with Children. These meetings occur twice each month. The Coordinated Entry Manager leads these meetings. The CE Manager will provide a list of households (de-identified client ID numbers) to discuss one to two days prior to the scheduled meeting. If someone is working with a household on this list, they must attend the meeting or make advance arrangements with the CE Manager. Housing providers will provide a list of vacancies and potential transfers to the CE Manager one to two days prior to the scheduled meeting. A representative from each housing provider must be present at each meeting. If a representative is not available, advance arrangements must be made with the CE Manager.

There are not Housing Placement meetings for Single Adults. As soon as a housing provider is aware of an opening in their program, they must contact the Coordinated Entry Manager. The CE Manager runs the Housing Priority List for Single Adults and sends the housing provider the name of the household at the top of the Housing Priority List with all of their documentation completed (see Permanent Supportive Housing section) and what outreach worker they are connected to. When a household is at the top of the priority list and a match has been identified, their preferences must be considered by accessing their Participant Interest Form. A housing option can be rejected by a household. The household does not lose their spot on the list for rejecting an option. There is no limit to the number of times a household may reject a placement.

Households shall not be steered toward any particular housing facility or neighborhood based on a protected class (see nondiscrimination section).

Housing providers may not reject a household for assistance based on perceived barriers to housing or services. CoC, EHH and ESG funded programs must use the Coordinated Entry process as the only referral source from which they fill vacancies in housing or services.

B. CONTACTING PEOPLE ON THE HOUSING PRIORITY LIST

If staff is completing data clean-up of the Housing Priority List to see if people are still in need of housing, there will be times when staff is unable to make contact with the person. Staff must attempt contact at least three times over the course of a 30-day period. Contacts must be recorded in the “Coordinated Entry Referral Follow Up” section in the Assessments tab of the client profile in HMIS. Contacts can be made via telephone, text, or e-mail. Staff must also reach out to the following applicable entities: outreach providers, placement meeting providers and school district or Head Start staff. If no one is able to contact the household, staff will cancel the referral to the Housing Priority List.

Best practices for contacting clients:

- Attempt contact during different times of the month (beginning, middle, end).
- Contacts should be made over the course of 30 days, not all in one week.
- If staff is able to text, please try this as someone’s phone may be out of minutes, but they can still send and receive text messages.
- Bring the name to the outreach meeting and placement meeting to see if anyone has information.

- Check the VINE system to see if the person is incarcerated.
- If your agency allows, staff may use an agency Facebook page to attempt contact.

C. HOLDING A UNIT FOR CLIENT PLACEMENT

When an agency receives a name from the priority list, staff must initiate contact with the person within two business days. (See “Best practices for contacting clients” above, under Contacting People on the Housing Priority List.) There may be circumstances where two agencies work together to connect with someone. It is the receiving agency’s responsibility to ensure contact. Staff must attempt to contact a participant three times during seven business days. All attempts must be documented in HMIS under the Coordinated Entry Referral Follow Up section. If staff attempts contact on three occasions during the seven business days and does not get a response, they may move to the next household on the priority list.

GRIEVANCE PROCEDURE FOR COORDINATED ENTRY

Households have the right to file a grievance if there is a violation of the Coordinated Entry Policies and Procedures received through the Dane County Coordinated Entry System. Households are informed about the grievance policy during their initial meeting with Coordinated Entry staff. The policy is accessible on the Homeless Services Consortium website (www.danecountyhomeless.org).

Households have the right to be assisted by an advocate of their choice (agency staff person, co-worker, friend, family member, etc.) at each step of the grievance process. Households have the right to withdraw their grievance at any time.

If a household has a grievance regarding a specific agency or representative of that agency, they should be directed to that agency’s grievance policy. Agencies should post their grievance policies on their websites.

There are two levels of review available for each grievance.

- Level 1: The first person to review the grievance is the CoC Coordinator. Households should contact the CoC Coordinator for Dane County to start the process. Contacts can be made through the HSC website (www.danecountyhomeless.org) via the “contact us” function, hsc@cityofmadison.com or 608-266-6254. Grievances can be made in writing or verbally and should state the alleged violation of the Coordinated Entry policies and procedures. Within two business days, the CoC Coordinator will contact the agency/staff in question to request a response to the grievance, including any actions that were taken to attempt to resolve the issue. The response must be provided to the CoC Coordinator within five business days of request. Once the CoC Coordinator has gathered relevant information about the incident, they will decide what, if any, action needs to be taken. The CoC Coordinator will provide a written decision within 15 days of the initial complaint.

If both the household and the provider agree, the process ends and the resolution is implemented.

If the household or provider disagrees, the grievance moves to the next level.

- Level 2: The Dane County CoC Board of Directors President reviews the grievance within five business days of being informed of dissatisfaction with the Coordinator’s resolution. The Board President may designate one or more Board members to review the situation. The grievant has the right to present any additional information and may present it in person. The Board will have 10 business days to gather and review relevant information. Within 30 days of the

grievance being moved to Level 2, the Board President will provide a written decision. The decision of the Board of Directors is final.

DATA MANAGEMENT

The Coordinated Entry System uses a Homeless Management Information System (HMIS) to track data and store the Housing Priority List. The HMIS Lead Agency, the Institute for Community Alliances (ICA), has policies and procedures in place to ensure the adequate privacy protections of all household information. All HMIS users are required to abide by the [HMIS Policies and Procedures](#).

All HMIS users are required to complete an annual Security Training provided by ICA. The training covers the privacy rules associated with collection, management and reporting of client data.

Coordinated Entry staff will receive household consent, written or verbal, through an HMIS Release of Information before sharing household information in HMIS. All shared information is for the purpose of assessing and referring households to housing and services provided through the Coordinated Entry process. The only information to be shared is that for which the household has provided consent. Households will not be denied services for refusal to have their information shared in HMIS.

EVALUATION

Annually, the HSC will conduct an evaluation of the Coordinated Entry System. The evaluation will include a review of the CE policies and procedures, assessment by households accessing the system and feedback from housing and service providers. The evaluation will look at the intake, assessment and referral process of Coordinated Entry. All participating agencies will be asked to evaluate the system. Surveys will be distributed to households at participating agencies including, but not necessarily limited to The Beacon, The Salvation Army, Porchlight Men's Shelter and Tenant Resource Center and participating housing programs. Any household information collected during the evaluation period will be kept private. Surveys will be kept confidential and identifying information will not be collected.

The annual surveys for participants and housing and service providers will be developed by the Core Committee, and distributed according to a timeline set by the Core Committee. The Core Committee or other HSC designee will present the survey results and a plan to implement changes to the CE System.

The Core Committee will receive updates from the CE Manager as requested. The CE Manager will seek feedback from the Core Committee as needed, in order to facilitate ongoing evaluation of the system.

The Core Committee and HSC Board of Directors will review the CoC's System Performance Measures every six months, consider how the system is affecting Performance Measures and what changes can be implemented to improve performance.

APPENDIX A: DEFINITIONS OF HOMELESSNESS

1. 24 CFR §583.5 HUD HOMELESS DEFINITION

1. An individual or family who lacks a fixed, regular and adequate nighttime residence, meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, camping ground;
 - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangement (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

2. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C.2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

4. Any individual or family who:

- i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- ii. Has no other residence; and
- iii. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

2. 24 CFR §578.3 HUD CHRONICALLY HOMELESS DEFINITION

1. 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:
 - i. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ii. 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, as long as 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, as long as 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;
2. 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 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 paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

3. 24 CFR §576.2 HUD AT RISK OF HOMELESSNESS DEFINITION

At risk of homelessness means:

1. An individual or family who:
 - i. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
 - ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and
 - iii. Meets one of the following conditions:

- a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - b. Is living in the home of another because of economic hardship;
 - c. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - d. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - f. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
2. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e- 2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
 3. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

APPENDIX B: CERTIFICATION FOR EMERGENCY TRANSFER

CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, AND ALTERNATE DOCUMENTATION

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

OMB APPROVAL NO. 2577-0286, EXP. 06/30/2017

PURPOSE OF FORM

The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

USE OF THIS OPTIONAL FORM

If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

1. A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
2. A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
3. At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

SUBMISSION OF DOCUMENTATION

The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

CONFIDENTIALITY

All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that

disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

1. Date the written request is received by victim: _____
2. Name of victim: _____
3. Your name (if different from victim's): _____
4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____
6. Name of the accused perpetrator (if known and can be safely disclosed): _____
7. Relationship of the accused perpetrator to the victim: _____
8. Date(s) and times(s) of incident(s) (if known): _____
10. Location of incident(s): _____

<p>In your own words, briefly describe the incident(s):</p> <p>_____</p> <p>_____</p> <p>_____</p>
--

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

PUBLIC REPORTING BURDEN

The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

APPENDIX C: PREVENTION PRIORITIZATION TOOL

The information provided for the prioritization is based on self-report.

Factor	Score	Participant Score
Eviction Process (choose only one)		
Has a stipulated dismissal (court order) which requires payment of money	10	
Has an eviction court date scheduled	5	
Has a 5, 14, or 30 day notice but no court date scheduled	3	
Lives in Subsidized Housing (choose only one)		
Has Section 8 voucher or lives in CDA/DCHA public housing	5	
Lives in other subsidized housing (i.e. Northport, Meridian, etc.)	4	
Lives in Section 42 or comparable housing	2	
Eviction History (choose only one)		
Has 1 or more eviction judgement in CCAP in the past 2 years	5	
Has 1 or more eviction judgement in CCAP in the past 5 years	3	
Has ever had an eviction filed in CCAP	2	
Other eviction record or evictions that are not in CCAP	1	
Criminal History (choose one)		
On sex offender registry	5	
Past Felony(ies)	3	
Past misdemeanors	1	
Other Factors (may choose more than one)		
Needs and lives in wheelchair accessible unit	1	
Household of 5 or more members	1	
	Total	

APPENDIX D: DIVERSION ASSESSMENT TOOL

1. Where did you sleep last night?

2. If staying in someone else's housing:

(things to consider: rental/owned unit, landlord, total length of stay thus far, landlord's knowledge of situation)

a. What issues exist with you remaining in your current housing situation?

b. Can those issues be resolved with financial assistance, case management, etc.?

c. Are you currently experiencing domestic violence?

3. If coming from their own unit:

a. Is it possible and safe to stay in your current housing unit?

b. What resources would you need to do that? (give the examples below)

financial assistance

case management

mediation

transportation

other: _____

5. What other safe housing options do you have for the next few days or weeks?

6. Is there anywhere safe you could stay for at least the next three (3) to seven (7) days if you were able to receive case management services/transportation assistance/limited financial support?

Yes No

Help individual think through potential places – with family, friends, co-workers. Have them identify what barriers they think exist to staying in a certain location and how they might be overcome.

APPENDIX E: TRANSFER REQUEST FORM

TO BE COMPLETED BY PROGRAM COORDINATOR OR PROPERTY MANAGER AND SUBMITTED TO CE MANAGER.

Note: This form will only remain active for 90 days. If household is still in need of transfer after 90 days, a new form must be submitted.

Date: _____ Name of Staff Requesting Transfer: _____

Head of Household Name: _____

Current Housing Program: _____ Program Entry Date: _____

Number of People in Household: _____ Number of Minor Children: _____

Transfers are limited to those that meet eligibility and prioritization standards listed in the *Program Transfer* section of the Dane County Written Standards. Please indicate which of the following standards the household meets:

- _____ Emergency transfer request (VAWA) [attach emergency transfer documentation]
- _____ ADA request for an accessible unit [attach documentation regarding accessibility needs]
- _____ Change in household composition*
- _____ Within 60 days of program termination**

*If transfer is due to a change in household composition, please describe the size of unit needed: _____

**If transfer is due to impending program termination, please list the following:

Lease Violation(s) that is causing termination:

Landlord/Property Manager Notices that directly relate to termination (types and dates):

Please indicate all attached documentation:

- _____ Verification of Disability [required for permanent supportive housing (PSH) transfers]
- _____ Homeless History [required for PSH]/Proof of Homelessness at Project Entry [required for rapid rehousing (RRH)]
- _____ Emergency Transfer Documentation [for VAWA requests]
- _____ Documentation re: Accessibility Needs
- _____ Other [please list]: _____

Staff Signature: _____ Date: _____

COORDINATED ENTRY MANAGER USE ONLY

_____ Transfer granted | Participant to transfer to the following program: _____

_____ Transfer denied | Notes: _____

APPENDIX F: LIST OF ACRONYMS AND GLOSSARY

Affordable Housing: Housing for which the occupant(s) is/are paying no more than 30 percent of their income for gross housing costs, including utilities. ([US Department of Housing and Urban Development](#))

AHAR = Annual Homeless Assessment Report: A HUD report to the U.S. Congress that provides nationwide estimates of homelessness, including information about the demographics of people experiencing homelessness, service use patterns and the capacity to house homeless persons. ([US Department of Housing and Urban Development](#))

Chronic Homelessness: A homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven. ([US Department of Housing and Urban Development](#))

CoC = Continuum of Care: A HUD-mandated program designed to 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 homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness. ([US Department of Housing and Urban Development](#)) The Homeless Services Consortium (HSC) is Dane County's CoC.

CE = Coordinated Entry: A process designed to quickly identify, assess, refer and connect people in crisis to housing and assistance, no matter where they show up to ask for help. It can pave the way for more efficient homeless assistance systems by: helping people move through the system faster to housing, reducing new entries into homelessness by consistently offering prevention and diversion resources upfront, and improving data collection and quality and providing accurate information on what kind of assistance consumers need. ([National Alliance to End Homelessness](#))

Dating Violence: Violence committed by a person:

1. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
2. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship;
 - The type of relationship; and
 - The frequency of interaction between the persons involved in the relationship. ([U.S. Department of Justice](#))

DV = Domestic Violence: includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. The term spouse or intimate partner of the victim includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, they type of the relationship, and the frequency of interaction between the persons involved in the relationship. ([U.S. Department of Justice](#))

Diversion: A strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. ([National Alliance to End Homelessness](#))

Doubled-up: sharing the housing of other persons due to loss of housing, economic hardship or a similar reason ([Department of Education](#))

EHH = Emergency Solutions Grant, Housing Assistance Program, Homeless Prevention Program: These programs are collectively referred to as the EHH Program. ESG is Federally administered by the United States Department of Housing and Urban Development (HUD). HUD awards ESG funding to the State of Wisconsin Department of Administration Division of Energy, Housing and Community Resources (DEHCR) to distribute to eligible applicants. HAP and HPP are State of Wisconsin funding sources. ([State of Wisconsin, Dept. of Administration](#))

ES = Emergency Shelter, EFS = Emergency Family Shelter: A facility that plays a critical role in ending homelessness. It provides a safe, short term, nighttime residence for homeless persons, and help them find safe affordable housing outside the shelter. Emergency shelters do not require occupants to sign leases or occupancy agreements. Effective shelters embrace a Housing First approach, offer immediate and low-barrier access to anyone facing a housing crisis, and measure shelter performance in order to improve results. ([National Alliance to End Homelessness](#))

ESG = Emergency Solutions Grant: Federally administered by HUD. Funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance and HMIS; as well as administrative activities. ([US Department of Housing and Urban Development](#))

FEMA = Federal Emergency Management Agency: FEMA provides funds to the Emergency Food and Shelter Program to support social service agencies to supplement food, shelter, rent mortgage and utility assistance programs for people with non-disaster related emergencies.

Functional Zero: A community has ended veteran homelessness when the number of veterans experiencing homelessness falls below the average monthly housing placement rate. A community has ended chronic homelessness when the number of people experiencing chronic homelessness falls to 3 or fewer, or else .1% of the most recent point-in-time count (whichever is greater). ([Community Solutions](#))

GIW = Grant Inventory Worksheet: The GIW is used to record all grants that are eligible for renewal funding within a CoC's geographic area for the Continuum of Care (CoC) Program Competition. ([Dane County GIW for FY 2018 CoC Competition](#))

Harm Reduction: A set of practical strategies and ideas aimed at reducing negative consequences associated with drug use. Harm Reduction is also a movement for social justice built on a belief in, and respect for, the rights of people who use drugs. ([Harm Reduction Coalition](#))

HSC = Homeless Services Consortium: Dane County's Continuum of Care (CoC). The HSC is a partnership of agencies, funders, advocates and formerly homeless persons committed to preventing and ending homelessness.

HMIS = Homeless Management Information System: HMIS is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Each Continuum of Care is responsible for selecting an HMIS software solution that complies with HUD's data collection, management and reporting standards. [Institute for Community Alliances](#) is the HMIS lead for the Dane County CoC. ([US Department of Housing and Urban Development](#))

Housing First: An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry. ([Department of Housing and Urban Development](#))

Housing Locator: A person who identifies and recruits landlords and encourages them to rent to homeless households served by programs ([National Alliance to End Homelessness](#))

Housing Navigator: A person who works alongside households who are looking for housing. The navigator assists with development of a housing stability plan, assists in completion of housing search and applications, addresses barriers to housing placement, assists in appeal process for denials, helps in understanding of leases and helps to secure move-in costs.

HIC = Housing Inventory Count: The HIC is a point-in-time inventory of projects within the CoC that provide beds and units dedicated to serving persons who are homeless. It is intended to provide HUD and CoCs with information about the shelter and housing capacity of homeless crisis response systems. ([US Department of Housing and Urban Development](#))

Housing Stability: the extent to which a household's access to safe and permanent housing is secure.

HUD = [Department of Housing and Urban Development](#): HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; build inclusive and sustainable communities free from discrimination, and transform the way HUD does business.

ICA = [Institute for Community Alliances](#): HMIS Lead for Madison/Dane County CoC

LSA = Longitudinal Systems Analysis: An annual report, produced from HMIS and submitted to HUD, providing critical information about how people experiencing homelessness use the system of care.

McKinney-Vento Act: A federal law that ensures immediate enrollment and educational stability for children and youth experiencing homelessness ([Department of Education](#))

NOFA = Notice of Funding Availability: Each year HUD releases a NOFA that establishes the funding criteria for the Continuum of Care (CoC) Program. ([US Department of Housing and Urban Development](#))

PIT = Point-In-Time Count: A point-in-time count is an unduplicated count on a single night of the people in a community who are experiencing homelessness that includes both sheltered and unsheltered populations ([National Alliance to End Homelessness](#))

PSH = Permanent Supportive Housing: Permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability to achieve housing stability. ([US Department of Housing and Urban Development](#))

Racial Justice: The systematic fair treatment of people of all races, resulting in equitable outcomes for all. ([Race Forward](#))

RRH = Rapid Rehousing: An informed by a Housing First approach that is a critical part of a community's effective homelessness crisis response system. Rapid re-housing rapidly connects families and individuals experiencing homelessness to permanent housing through housing location services, rental assistance, and access to support services. ([US Department of Housing and Urban Development](#))

Sexual Assault: any nonconsensual sexual contact proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent. ([U.S. Department of Justice](#))

SPDAT = Service Prioritization Decision Assistance Tool: An evidence-informed approach to assessing a household's acuity. The tool, across multiple components, prioritizes who to serve next and why, while concurrently identifying the areas in the household's life where support is most likely necessary in order to avoid housing instability. ([OrgCode Consulting Inc.](#))

Stalking: engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for the person's individual safety or the safety of others; or
2. Suffer substantial emotional distress. ([U.S. Department of Justice](#))

SO = Street Outreach: Street outreach workers engage with people experiencing unsheltered homelessness in order to connect them with emergency shelter, housing or other critical services. Street outreach services are provided in non-facility-based settings for people experiencing unsheltered homelessness who are not accessing emergency shelter, housing or an appropriate health facility. ([Dane County Written Standards](#))

TAY = Transition Age Youth: Young people between the ages of 18-24.

TH = Transitional Housing: Housing designed to provide homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing ([US Department of Housing and Urban Development](#))

Trauma Informed Care: An organizational structure and treatment framework that involves understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both consumers and providers, and helps survivors rebuild a sense of control and empowerment. ([The Trauma Informed Care Project](#))

Unaccompanied Youth: A youth not in the physical custody of a parent or guardian. ([United States Interagency Council on Homelessness](#))

VA = Veteran's Administration: The VA's mission is to provide veterans the world-class benefits and services they have earned – and to do so by adhering to the highest standards of compassion, commitment, excellence, professionalism, integrity, accountability, and stewardship.

VAWA = Violence Against Women Act: Creates and supports comprehensive, cost-effective responses to domestic violence, sexual assault, dating violence and stalking. Programs are administered by the U.S. Departments of Justice and Health and Human Services. ([National Network to End Domestic Violence](#))

VI-SPDAT = Vulnerability Index-Service Prioritization Decision Assistance Tool: A pre-screening tool that helps identify who should be recommend for types of housing and support interventions, moving the discussion from simply who is eligible for a service intervention to who is eligible and in greatest need of that intervention. This tool helps prioritize people for interventions. ([OrgCode Consulting Inc.](#))

VI-F-SPDAT = VI-SPDAT for families

TAY-VI-SPDAT= VI-SPDAT for transition age youth

APPENDIX G: WEBSITES FOR ADDITIONAL INFORMATION

Community Plan to Prevent and End Homelessness

<https://www.danecountyhomeless.org/governance>

Community Solutions – Built for Zero

<https://community.solutions/>

Dane County Homeless Services Consortium

<http://www.danecountyhomeless.org/>

National Alliance to End Homelessness

<http://www.endhomelessness.org/>

National Center for Homeless Education

<https://nche.ed.gov/>

National Health Care for the Homeless Council: Engaging Youth Experiencing Homelessness

<https://nhchc.org/wp-content/uploads/2019/08/engaging-youth-experiencing-homelessness.pdf>

National Law Center on Homelessness and Poverty

<https://nlchp.org/>

Progressive Engagement

[What is Progressive Engagement?](#) - National Alliance to End Homelessness

[Rapid Rehousing Handbook](#) - Point Source Youth

[Progressive Engagement](#) - Veterans Administration

[What is Progressive Engagement](#) - Safe Housing Partnerships

[Rapid Rehousing Toolkit](#) - National Alliance to End Homelessness

State of Wisconsin – EHH Funding

<https://doa.wi.gov/Pages/LocalGovtsGrants/Emergency-Solutions-Grant-Transitional-Housing-Program-Homelessness-Prevention-Program-ETH.aspx>

U.S. Department of Education – McKinney-Vento

<https://www2.ed.gov/policy/elsec/leg/esea02/pg116.html>

U.S. Department of Housing and Urban Development, HUD Exchange

<https://www.hudexchange.info/>

U.S. Department of Veterans Affairs
<https://www.va.gov/>

U.S. Interagency Council on Homelessness
<https://www.usich.gov/>

APPENDIX H: LIST OF DOCUMENT REVISIONS

4/4/2016

Original version approved by the Madison/Dane County CoC Board of Directors.

8/26/2016

Revised the participant eligibility scoring criteria for permanent supportive housing and rapid re-housing programs to place a greater emphasis on a participant's VI-SPDAT score.

11/1/2016

Revised the participant eligibility criteria for rapid re-housing programs. Limited the eligible VI-SPDAT score range to the rapid re-housing score range suggested by the creators of the VI-SPDAT, OrgCode Consulting.

1/27/2017

Added prevention program standards.

5/19/2017

Board approved update to Street Outreach standards and approved Diversion standards and Diversion tool.

11/16/2017

Board approved addition of Emergency Transfer section.

01/19/2018

Board approved addition of Coordinated Entry Policies and Procedures appendix.

09/21/2018

Board approved revisions to Section 1.

10/19/2018

Board approved addition of Transfer Request Form appendix.

12/21/2018

Board approved update to Permanent Supportive Housing section.

03/15/2019

Board approved updates to Street Outreach, Diversion, Emergency Shelter and Transitional Housing sections.

05/17/2019

Board approved updates to Coordinated Entry section.

08/16/2019

Board approved updates to the prioritization policy.

11/22/2019

Board approved updates to the Rapid Rehousing section.

02/21/2020

Board approved updates to the Emergency Transfer Section. Removed language from PSH Minimum Standards around ensuring participant safety during extreme weather. Removed language from Termination and Grievance Procedures around holding participant property for 30 days.

10/16/2020

Board approved addition of prioritization requirements for prevention services.

12/18/2020

Board approved revisions to Introduction, Program Standards, Appendix G: List of Acronyms and Glossary, and Appendix H: Websites for Additional Information

9/23/2021

Board approved revisions to Prevention, Emergency Shelter, and Rapid Rehousing sections to meet State of Wisconsin funding requirements.

11/23/2021

Board approved removal of medical exception language.

04/15/2022

Board approved addition of program transfer section.

01/20/2023

Board approved change in the Coordinated Entry section to allow removal of names from priority list if they have not accessed services in the past six months (previously was in the last two years).

05/03/2023

Board approved addition of Youth Specific System Navigation and Joint Transitional Housing – Rapid Rehousing Sections.

07/05/2023

Board approved updates to Rapid Rehousing Section and addition of Progressive Engagement Resources to Appendix G.

01/03/2024

Board approved updates to the Street Outreach section.

04/03/2024

Board approved updates to standards pertaining to informing households about their educational rights and a new policy related to the Coordinated Entry Release of Information.