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**COMMUNITY ACTION COALITION  
FOR SOUTH CENTRAL WISCONSIN, INC.**

# **SUPPORTIVE HOUSING PROGRAMS**

**POLICIES & PROCEDURES MANUAL**

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## INTRODUCTION

### ABOUT THE MANUAL AND CAC

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#### SUMMARY

This manual is intended to provide the policies and procedures associated with the Community Action Coalition for South Central Wisconsin's housing programs and services. These programs are supported by a variety of funding sources and thus governed by various sets of program rules. This manual provides an explanation of each program's rules. Programs administered by this agency are governed by the following documents: the Written Standards for each participating county in the Continuum of Care, the HUD Interim Rule (CoC), which focuses on regulatory implementation of the Continuum program, including the Continuum's planning process, and the HUD Interim Rule (ESG). Finally, this manual is in the process of production, and it will be developed and revised over time. A review of policies and procedures is made both annual and when program features or requirements change.

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#### OUR MISSION

Founded in 1966, the Community Action Coalition for South Central Wisconsin, Inc. (CAC) has created and operated a wide variety of programs aligned with its mission: to reduce and/or eliminate poverty in our communities. CAC builds on the strengths, assets and capacities of low-income individuals and families to develop solutions to ending poverty. CAC is committed to helping people develop the capacity, knowledge and skills necessary to overcome social and economic hardships, strengthen their futures, and find hope.

Our mission: To develop the economic and social capacities of individuals, families and communities to reduce poverty in Dane, Jefferson and Waukesha counties.

Our values: Being helpful, respectful, striving for excellence, and rising above.

## CONTINUUM OF CARE (COC) PROGRAM

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### DESCRIPTION

The Continuum of Care Program (CoC) is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services necessary to help such individuals move into transitional and permanent housing, with the goal of long-term stability. This program was also designed, more broadly, to promote community-wide planning and strategic use of resources to address homelessness, improve coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improve data collection and performance measurement; and allow each community to tailor its programs to the strengths and challenges in assisting homeless individuals and families within that community.

Under the CoC Program interim rule, eligible applicants consist of nonprofit organizations, State and local governments, and public housing agencies. In the state of Wisconsin, there are four planning bodies in the Continuum of Care: Milwaukee, Racine, Dane, and the Balance of State. CAC has agency locations in Dane County, as well as in Jefferson and Waukesha counties. The Dane County office participates in the Dane CoC and the Jefferson and Waukesha offices participate in the Balance of State CoC.

Written standards for both CoCs offer more detailed explanations about CoC program requirements, procedures and case management practice.

## HOUSING FIRST

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### DEFINITION

The *Housing First*<sup>1</sup> model is an evidence-based practice for serving homeless people with the greatest barriers to housing and has been endorsed by the U.S. Department of Housing and Urban Development and the U.S. Interagency Council on Homelessness. Both Dane and Balance of State CoCs have adopted this model as it is the most effective approach to ending homelessness.

For more information on *Housing First* and its implementation in both Dane and Balance of State CoCs, please consult each CoCs' most recently published Written Standards.

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<sup>1</sup> Source: <https://files.hudexchange.info/resources/documents/Housing-First-Permanent-Supportive-Housing-Brief.pdf>

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## APPROACH

CAC is a *Housing First* agency, meaning that our programs are designed to assist homeless people to obtain housing as quickly as possible. CAC provides supportive services as needed to ensure long-term stability. Rather than moving homeless individuals through different "levels" of housing (i.e. from the streets to an emergency shelter, from a shelter to a transitional housing program, and from there to their own apartment in the community), CAC moves homeless individuals or households immediately from the streets or shelter into their own apartments. Someone experiencing homelessness must have their basic need of housing met before they can address barriers such as lack of income, unemployment, substance use or untreated mental illness. Without housing, such barriers are far more difficult to overcome.

The core components of the *Housing First* approach are:

- **Few to no program prerequisites to permanent housing entry** – People that experience homelessness are offered housing with no preconditions such as sobriety, completion of an alcohol or drug treatment program, or agreeing to comply with treatment upon into any of CAC’s housing programs.
- **Low barrier admission policies** – Admissions policies are designed to “screen-in” rather than “screen out” participants with the greatest barriers to housing, such as having little to no income, poor rental history, past evictions, or a criminal history. While CAC strives to work with landlords who honor the low-barrier provisions of *Housing First*, some landlords may have their own screening criteria, such as renting to sex crime offenders.
- **Rapid, streamlined entry into housing** – Making efforts to assist people experiencing homelessness move quickly into permanent housing means streamlining the application and approval process.
- **Voluntary supportive services but can and should be used to proactively engage tenants to ensure housing stability** – While supportive services are beneficial to maintaining stable housing, participants are not required to participate in these services. Strategies such as harm reduction, motivational interviewing, and non-judgmental communication may be used in lieu of supportive services to mitigate harms from substance use or encourage participants to acquire and utilize new skills and information.
- **Tenants have full rights, responsibilities, and legal protections** – Participants hold leases that discuss the full range of right, responsibilities, and protections under Federal, state, and local housing laws. Participants are educated about their leasing terms, given access to legal assistance (as needed), and encouraged to exercise their full legal rights and responsibilities as permanent housing tenants. Housing providers and the landlords with whom they partner are expected to abide by their legally defined roles and obligations, such as tenant privacy.

- **Policies and practices in place to prevent lease violations and evictions** – Programs should incorporate practices and policies that prevent lease violations and evictions among tenants. There may also be policies that offer flexibility in rent payment, such as paying 30% of a participant’s income and establishing payment arrangements for participants that are experiencing an economic hardship.
- **Applicable to a variety of housing models, such as scattered-site or project-based housing** – The *Housing First* model considers a provider’s program design and can be implemented in different types of supportive housing settings.



## HUD DEFINITIONS OF HOMELESSNESS

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### 24 CFR 583.5 – HUD HOMELESS DEFINITION

Dane CoC: see Appendix A in the Dane CoC’s most recently published Written Standards.

Balance of State CoC: see the Balance of State CoC’s most recently published Written Standards for CoC and ESG, per program component (PSH, TH, RRH). This is where the Balance of State’s approved verbiage is found.

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### 24 CFR 578.3 – HUD CHRONICALLY HOMELESS DEFINITION

Dane CoC: see Appendix B in the Dane CoC’s most recently published Written Standards

Balance of State CoC: see the Balance of State CoC’s most recently published Written Standards for CoC and ESG, per program component (PSH, TH, RRH). This is where the Balance of State’s approved verbiage is found.

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### 24 CFR 583.5 – HUD AT-RISK OF HOMELESSNESS DEFINITION

Dane CoC: see Appendix A in the Dane CoC’s most recently published Written Standards.

Balance of State CoC: see the Balance of State CoC’s most recently published Written Standards for CoC and ESG, per program component (PSH, TH, RRH). This is where the Balance of State’s approved verbiage is found.

Homeless definitions for both CoCs and the ESG grant program can also be found here:

[https://www.hudexchange.info/resources/documents/HEARTH\\_HomelessDefinition\\_FinalRule.pdf](https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf)

<https://www.hudexchange.info/resource/2020/the-homeless-definition-and-eligibility-for-shp-spc-and-esg/>

## PROGRAM DESCRIPTIONS

### COE PROGRAM-FUNDED PROJECTS

#### PERMANENT SUPPORTIVE HOUSING (PSH)

Permanent supportive housing is defined as community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. The CoC Program funds two types of permanent housing: permanent supportive housing (PSH) for persons with disabilities and rapid re-housing. Permanent supportive housing is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability. Under PSH, a program participant must be the tenant on a lease (or sublease) for an initial term of at least one year that is renewable and is terminable only for cause. Further, leases (or subleases) must be renewable for a minimum term of one month.

#### CAC DANE COUNTY SUPPORTIVE HOUSING PROGRAM (SHP)

CAC Dane County Supportive Housing Program (SHP) is a consolidation of its two current *Housing First*-oriented programs, Home for Good and SHIFT. Both are scattered site programs and only serve families and individuals in Dane County. The SHP program focuses on balancing three distinct components of the permanent supportive housing model: housing stability, supportive services and property and housing management. The two programs were combined in 2019 to streamline resources for participants and make reporting more efficient. The program offers 19 housing unit. Program participants are required to pay CAC 30% of their gross income, per HUD regulation, as determined by a HUD-specified formula, as rent.

#### PROJECT WISH IN WAUKESHA COUNTY

Like Dane County's permanent housing programs, Project WISH, or Waukesha Innovative Supportive Housing, is also a *Housing First* program. This program is designed to accept and assist chronically homeless individuals. Through financial support and intensive case management, participants are encouraged to achieve self-sufficiency throughout the course of the program.

Project WISH provides funding to support 9 housing units. WISH is a scattered site program, meaning CAC rents apartments in Waukesha County and, in turn, sublets them to WISH project participants. Per HUD regulation, program participants are required to pay CAC 30% of their gross income, as determined by HUD-specified formulas, as rent. While the WISH contract is with HUD directly, local governance is with the Housing Action Coalition, the Waukesha County lead agency for the Continuum of Care (CoC) Program.

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## TRANSITIONAL HOUSING (TH)

Transitional housing (TH) is designed to provide homeless individuals and families with the interim stability and support necessary to successfully move to and maintain permanent housing. Transitional housing may be used to cover the costs of up to 24 months of housing with accompanying supportive services. Program participants must have a lease (or sublease) or occupancy agreement in place when residing in transitional housing. The provisions of the CoC Program's TH program component have not changed significantly from the TH provisions under the Supportive Housing Program (SHP) sponsored by HUD.

### **JEFFERSON COUNTY TRANSITIONAL HOUSING PROGRAM (THP)**

The only transitional housing program offered at the CAC, the Jefferson County Transitional Housing Program (THP) is designed to accept and assist homeless individuals. Through financial support and intensive case management, participants are encouraged to achieve self-sufficiency throughout the course of the program. THP provides up to 24 months of subsidized housing to eligible participants with the offer of case management support. CAC maintains 14 scattered site apartments in Jefferson County.

## ESG-FUNDED PROJECTS

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### RAPID RE-HOUSING (RRH)

Rapid re-housing (RRH) emphasizes housing search and relocation service and short- and medium-term rental assistance to rapidly move homeless persons and families (with or without a disability) into permanent housing.

#### **RAPID RE-HOUSING IN JEFFERSON AND WAUKESHA COUNTIES**

This program is designed to assist and accept homeless individuals and families and, through financial support and minimal case management, quickly move them to housing to regain stability. Supportive services such as security deposits and rental assistance subsidies are provided to eligible participants for helping those who are homeless to obtain and maintain housing. This is usually a six-month program. Participants generally have few barriers to housing.

#### **SUPPORTIVE SERVICES FOR VETERAN FAMILIES (SSVF) IN DANE AND JEFFERSON COUNTIES**

This program is designed to provide low-income veteran families with financial assistance and the offer of case management support to obtain or maintain permanent housing.

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### EMERGENCY SHELTER

The purpose of emergency shelter is to provide a safe, short-term, nighttime residence for homeless persons, and help them find safe, affordable housing outside the shelter. Occupants are not required to sign leases or occupancy agreements. The offer of case management support for up to six weeks to those who are homeless and meet eligibility criteria is a program component.

#### **HOMELESS MOTEL VOUCHERS IN JEFFERSON COUNTY**

CAC's Homeless Motel Voucher Emergency Shelter Program is available only in Jefferson County and is designed to assist homeless individuals and families with temporary shelter ranging from 1-6 weeks in local lodging facilities, such as motels. This has been organized to accommodate those that are experiencing homelessness in Jefferson County where emergency shelter facilities do not exist.

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## HOMELESSNESS PREVENTION (HP)

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

### **HOMELESSNESS PREVENTION SERVICES IN JEFFERSON AND WAUKESHA COUNTIES (ended June 30, 2019)**

This program, available in both Jefferson and Waukesha counties, is designed to assist individuals and families at risk of eviction. The program provides eligible participants who are under threat of becoming homeless with up to 3 months of financial assistance and the offer of case management support if they are receiving financial assistance.

## COORDINATED ENTRY

### COORDINATED ENTRY POLICIES & PROCEDURES

Coordinated Entry is a process developed to ensure that all people experiencing a housing crisis have fair and equal access to housing services and assistance. With Coordinated Entry, households in need of assistance are quickly identified, assessed for, referred, and connected to housing and assistance based on strengths and needs. Coordinated Entry is a method for enrolling individuals and households in our communities experiencing the greatest housing and service needs. This includes individuals and households that have been sleeping in emergency shelter, on the streets, or in a car, and have experienced long-term homelessness. Coordinated Entry is the primary intake system in both Dane and Balance of State CoCs. CAC follows all HUD guidelines regarding Coordinated Entry and the community priority list.

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#### ACCESS

To start the process of accessing Coordinated Entry within the Dane County CoC, one must begin at an access point.

Current access points in Madison: **The Beacon located at 615 E. Washington Ave.** in Madison, Wisc. To access Coordinated Entry within the Balance of State (BoS), one may use multiple access points in the system. This is known as the “No Wrong Door” approach to coordinated intake. One location in Jefferson County is the CAC Watertown office.

Refer to the BoS Coordinated Entry Manual for more information on BoS policies and procedures. Information on the Dane CoC’s Coordinated Entry system can be accessed in the most recently published Written Standards in Appendix D.

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#### ASSESSMENT

Homeless individuals and families will begin the process of assessment having accessed the Coordinated Entry system. The entry assessment is called the VI-SPDAT. 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 in both CoCs. The latest version is posted on the Homeless Services Consortium website in the Dane CoC. In the Balance of State CoC, assessments are found on the Coordinated Entry site.

The complete Service Prioritization Decision Assistance Tool (SPDAT) is recommended as an assessment tool for housing case management and housing programs. SPDATs should only be administered by qualified and trained staff. Results of a participant's SPDAT assessment are subsequently entered into the Homeless Management Information System (HMIS) or Wisconsin ServicePoint.

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#### REFERRALS

After a VI-SPDAT is administered, a referral is made to the community-wide prioritization list. There are two prioritization lists; one for homeless families and one for homeless individuals. HUD has effectively established that the Coordinated Entry process ensures that people with the greatest needs receive priority for any type of housing and homeless assistance available in the each CoC, including PSH, RRH, and other housing interventions.

The purpose of Coordinated Entry is to ensure that people with the most severe service needs and levels of vulnerability are prioritized for housing per HUD policies. Those experiencing chronic homelessness should be prioritized for permanent supportive housing. In some cases, PSH projects are required to serve people experiencing chronic homelessness and in other cases, HUD provides incentives for projects to do so. HUD has strongly encouraged communities to fully implement the prioritization process outlined in Notice CPD-014-12.

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#### PRIORITIZATION & PLACEMENT

All households referred to the community-wide priority lists are automatically prioritized based on the Order of Priority for each project type established by the Balance of State (BoS) and Dane CoCs. The established Order of Priority for BoS can be found here on page 30; the correct appendices for this information are provided. As for the Dane CoC, the established Order of Priority is found in the most recently published Written Standards on pp. 23-24.

Placements into a CAC program occurs when a program opening becomes available. At that point, the CAC caseworker or Program Leader will contact the lead agency to receive referrals from the community-wide priority list(s) in both the Balance of State and Dane CoCs.

The Homelessness Prevention prioritization and assessment process is separate from the above processes. Refer to the Balance of State Coordinated Entry system manual 2.0 (pp. 33-37) for more information.

## ELIGIBILITY BY PROGRAM

### PERMANENT SUPPORTIVE HOUSING (PSH)

#### CAC DANE COUNTY SUPPORTIVE HOUSING PROGRAM (SHP)

- Participants must meet categories 1- Literally Homeless or 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- Assistance provided only to individuals with disabilities and families in which at least one adult or child has a disability
- Referrals for SHP will be generated through the CoC Coordinated Entry process and the CoC-wide PSH priority lists for families and individuals
- Participants will not be screened out for:
  - Having too little or no income
  - Active, or history of, substance use or a substance use disorder
  - Having a criminal record
  - A history of domestic violence (i.e. lack of a protective order, period of separation from abuse or involvement of law enforcement)

See pages 22-28 of the Dane CoC's most recently published Written Standards for more information on prioritization, required documentation for verifying chronic homelessness, and CoC minimum standards.

#### PROJECT WISH (WAUKESHA INNOVATIVE SUPPORTIVE HOUSING) IN WAUKESHA COUNTY

All adult program participants must meet the following program eligibility requirements:

- 18 years old or older
- Literally Homeless (Category 1 of HUD homeless definition)
- Program participants must be chronically homeless
- Participants will not be screened out for:
  - Having too little or no income
  - Active, or history of, substance use or a substance use disorder
  - Having a criminal record
  - A history of domestic violence (i.e. lack of a protective order, period of separation from abuse or involvement of law enforcement)

Referrals are generated through the CoC Coordinated Entry process and the CoC-wide PSH priority lists for families and individuals.

See pages 6-8 of the Balance of State CoC's most recently published Written Standards for more information on CoC-governed policies and procedures related to program eligibility.



## TRANSITIONAL HOUSING (TH)

### JEFFERSON COUNTY TRANSITIONAL HOUSING PROGRAM (THP)

All adult program participants must meet the following program eligibility requirements:

- 18 years old or older
- Literally Homeless, Imminently At-Risk of Homelessness and/or Fleeing or Attempting to Flee domestic violence (Category 1, 2, and 4 of the HUD homeless definition)
- Participants will not be screened out for:
  - Having too little or no income
  - Active, or history of, substance use or a substance use disorder
  - Having a criminal record
  - A history of domestic violence (i.e. lack of a protective order, period of separation from abuse or involvement of law enforcement)

See pages 5-7 of the Balance of State CoC's most recently published Written Standards for more information on CoC-governed policies and procedures related to program eligibility.

## RAPID RE-HOUSING (RRH)

### RAPID RE-HOUSING IN JEFFERSON AND WAUKESHA COUNTIES

All adult program participants must meet the following program eligibility requirements:

- The household must meet either category 1 or category 4 of the HUD homeless definition (24 CFR 576.2). If the household meets category 4, they must also reside in one of the places set forth in category 1 at the time eligibility is determined.
- Programs cannot disqualify an individual or family based on poor rental history or evictions, criminal history or credit history.
- An income requirement of 30% County Median Income (CMI). Verification of participant's income is part of the intake process.

See the Balance of State CoC's most recently published Written Standards for more information on CoC-governed policies and procedures related to program eligibility in ESG-funded programs such as RRH.

## **SUPPORTIVE SERVICES FOR VETERAN FAMILIES (SSVF) IN DANE AND JEFFERSON COUNTIES**

All adult program participants must meet the following program eligibility requirements:

- Veteran with honorable discharge or member of a family where head of household is a veteran
- 50% or less of county median income (CMI)
- Literally homeless or at-risk of homelessness
- Participants will not be screened out for:
  - Having too little or no income
  - Active, or history of, substance use or a substance use disorder
  - Having a criminal record
  - A history of domestic violence (i.e. lack of a protective order, period of separation from abuse or involvement of law enforcement)

## **EMERGENCY SHELTER**

### **HOMELESS MOTEL VOUCHERS IN JEFFERSON COUNTY**

All adult program participants must meet the following program eligibility requirements:

- The household must meet either category 1, 2, 3, and 4 of the HUD homeless definition (24 CFR 576.2).
- An income requirement of 30% County Median Income (CMI). Verification of participant's income is part of the intake process.

## **HOMELESSNESS PREVENTION (HP)**

### **HOMELESS PREVENTION SERVICES IN JEFFERSON AND WAUKESHA COUNTIES (ended June 30, 2019)**

All adult program participants must meet the following program eligibility requirements:

- The household must meet either category 2, 3, and 4 of the HUD homeless definition (24 CFR 576.2).
- An income requirement of 30% County Median Income (CMI). Verification of participant's income is part of the intake process.
- Have received a valid five-day rental notice from their landlord.
- A score of 7 or more on the Prevention Screening Tool and must prove affordability using the Proof of Affordability form.

## CASE MANAGEMENT PROCESS

### ENROLLMENT

#### VERIFICATION

The Dane CoC provides oversight to the CAC's permanent supportive housing program (PSH) in Dane County. Similarly, the Balance of State CoC provides oversight to CAC's housing, homelessness prevention, and emergency shelter programs in Jefferson and Waukesha counties. Because CAC's supportive housing programs fall into two separate CoC Programs, verification and intake process may vary by project type and CoC.

#### **CAC's PSH program in Dane County uses the following verification process:**

- 1.) When there is an opening in the program, a potential participant is received from the prioritization list.
- 2.) Before selecting a participant, verification must occur. This starts with verifying an individual or family member's disability status and collecting documentation of chronic homelessness. To verify disability status, the Verification of Disability Form is used. To verify chronicity of homelessness, a caseworker may verify using HMIS. In some cases, other forms of documentation are accepted. These requirements are explicit in the most recently published Written Standards on pp. 25-27. Other forms are available here.
- 3.) When potential participants have met the eligibility requirements, the caseworker will proceed to enroll.

#### **CAC's PSH/TH/RRH programs in Jefferson and Waukesha County uses a similar verification process with separate, BoS-approved forms.**

Permanent Supportive Housing (PSH):

- 1.) Homelessness Verification Form
- 2.) Certification of Disability Form and supporting documents.
- 3.) Although PSH does not require income, a participant's income must be verified at the beginning of the program. See orientation process for income verification forms.

Transitional Housing (TH):

- 1.) Homelessness Verification Form
- 2.) Certification of Disability Form and supporting documentation of disability (if applicable).
- 3.) Although TH does not require income, a participant's income must be verified at the beginning of the program. See orientation process for income verification forms.

Rapid Re-Housing (RRH):

- 1.) Homelessness Verification Form
- 2.) Certification of Disability Form and supporting documentation of disability (if applicable).
- 3.) Program participant's income must be verified at the beginning of the program. See orientation process for income verification forms.

See the Balance of State CoC's most recently published Written Standards for more information.

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INTAKE

As soon as a family or participant has met all eligibility requirements, a CAC caseworker can begin to complete a rental application with a landlord. Programs operate on a scattered site model, which refers to a form of housing in which publicly funded, affordable, low-density units are scattered throughout diverse neighborhoods. CAC collaborates with landlords in communities where leases are held. Participants have choice in where they would like to live or relocate to in the future.

CAC staff will assist tenants or potential tenants in defining their housing needs and preferences, such as neighborhood type; closeness to transportation, services, recreational activities, and building or unit type. This practice is consistent with the *Housing First* approach adopted by the Dane and Balance of State CoCs. Participant interest is expressed during the intake process, if applicable. In many cases, CAC already has a unit available and can sublease the unit to the participant. Landlords may need to screen an individual or family applicant to be approved for housing. In all cases, the landlord must abide by Fair Housing and Equal Opportunity laws.

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## FAIR HOUSING & EQUAL OPPORTUNITY

Consistent with 24 CFR 578.93, CAC shall affirmatively market program vacancies to all eligible persons regardless of race, color, national origin, religion, sex, age, familial status or handicap. In accordance with both CoC programs' Coordinated Entry policies and procedures, vacancies are filled from the community-wide prioritization lists. Further, program participants are informed on right and remedies available under applicable federal, State and local fair housing and civil rights laws.

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## ORIENTATION

Once a participant or family is approved by the landlord, an orientation meeting is scheduled to complete forms, provide information on the program(s) in which they are enrolling, discuss program expectations, and begin to compile documents for the participant file (working and master) started by the caseworker assigned to the new participant or family. Purchase requests (PRs) are also completed (if applicable).

Forms include, but are not limited to:

- Participant Agreement
- Authorization for Release of Information (ROI)
- ServicePoint Release of Information (ROI)
- Participant Demographic form(s)
- Participant Interest Form for leasing process
- Grievance/Appeal Policy
- Additional documentation for household members
- Income Verification Form (may include Self-Declaration or Certification of Zero Income)
- Program-specific checklists for the participant file

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## HOUSING STABILIZATION PLAN

Appointments are made following the orientation meeting to discuss and assess the participant's needs, and to develop a housing plan with the participant or family. The purpose of the assessment is to obtain information from the participant about their unique situation, which include a brief social history indicating prior living arrangements, identification of needs, and reasons for homelessness.

CAC caseworkers are expected to discuss:

- Person-centered housing planning process per *Housing First*, which includes participant input regarding issues and needs to address and strategies for addressing them

- Disclosure of income (if applicable). Though in some cases income is not required, PSH program participants are expected to pay 30% of their gross income. This accumulates as program income.
- Availability of medical, mental health and/or substance abuse treatment services as needed
- Supportive services offered by the program and potential service outcomes

### Income Calculations

Income is calculated in accordance with **24 CFR 5.609 and 24 CFR 5.611(a)**.

If the household receives welfare assistance and part of these payments is designated for housing costs, rent payments can be made from this portion.

### Method and Frequency of Income Calculations

The participant's rent payments are no more than:

- 30% of the household's monthly adjusted income (AGI)

In most cases, income is calculated using the "20<sup>th</sup> Rule" for rental assistance provided by CAC. This means that for the current month's rent, CAC uses the income receipt of one full month prior to the current month, starting and ending on the 20<sup>th</sup>. For example, income is calculated from May 20th to June 20th for the following month's rent (July).

Income is re-calculated for the following reasons:

- When there are significant household income changes for any member in the household
- When the family composition changes
- After a participant has been enrolled in the program for one year
- Each month for some programs offering rental assistance since income changes depending on number of hours worked. This includes participants who quit their jobs voluntarily, get fired, laid off, or have their hours reduced significantly by an employer or per doctor's recommendations.

CAC caseworkers complete income calculations using the Income Calculation Worksheet for the appropriate county. This information is then used to determine rental assistance eligibility and rental subsidy payment in the Income, Rent & Utility Calculation Worksheet. Subsidies cannot be paid on rents that are not reasonable.

Copies of each income and rent calculation are printed and saved in the participant's file along with back-up documentation.

## Verification of Income

A participant's income is verified using the following acceptable proof of income including, but not limited to:

- 1) **Public benefits (i.e. SSI, SSDI, Child Support, Veteran's Benefits, etc.)** – Verification letter/statement from a caseworker of the agency indicating the amount of benefits received, and the start date of the benefit. If out-of-date benefits income is a barrier to obtaining available housing, applications can be processed with SSI/SSDI income verification that is up to 12 months old.
- 2) **Employment wages** – Up to three months of paycheck stubs.
- 3) **New employment wages** (if a participant recently started a new job and has not received at least one month of pay stubs) – Employment verification letter from employer, stating gross wages and hours, overtime pay for this year, or annual salary.
- 4) **Seasonal/irregular employment (if a participant is seasonally/irregularly employed)** – Most current Federal Income Tax Return Form 1040; AND most current two months of paystubs for the employment; AND employment verification from employer, which indicates the period of the year that the participant will work as a seasonal employee, or discontinued employment.
- 5) **Self-reporting income** – For self-declaration income such as recycling, day labor, etc., a most current Federal Income Tax Return Form 1040 with 1040 Schedule C and/or Form 8829 and a self-declaration or zero income verification form completed by the participant and CAC staff.
- 6) **Unemployment benefits** – Unemployment benefits verification letter.
- 7) If a student age 18 and older is **receiving financial aid**, it is recommended that the provider obtain a current school schedule and school year financial aid letter. Although financial aid (grants, school loans, work-study programs) is not considered income if a participant is enrolled in school, the CAC caseworker should obtain financial aid statements for their records.

Additional deductions made are at the discretion of the Program Leader per grant guidelines.

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## LEASING

As part of the Housing Stability Plan, the CAC caseworker should discuss leasing with the program participant. Provisions for being a tenant and basic obligations of tenancy such as rental payments, emergencies, lease violations, and when and how to contact the landlord are discussed.

The following must also be completed during leasing to successfully house a program participant:

*1.) HUD Quality Inspections (HQS)*

All housing leased with CoC program funds, or for which rental assistance payments are made, must meet applicable Housing Quality Standards (HQS). Documentation of compliance is retained, including conducting initial and annual housing inspections. At CAC, inspections are conducted by certified caseworkers, and completed forms are kept on record. See appendices in most recently published Written Standards for all Balance of State CoC projects: PSH, TH, RRH (ESG) and RRH (CoC) for HQS rules and forms. The same principles apply to Dane CoC projects as well. Finally, all housing must meet applicable State and local building codes.

*2.) Lead-Based Paint Disclosure*

All housing funded with CoC program funds must meet the lead-based paint requirements found at 24 CFR 982.401. These requirements include:

- Disclosing to the entity or household leasing the property/unit of the presence of any known lead-based paint and/or lead-based paint hazards
- Providing available records and reports and providing the entity/household leasing the property/unit with pamphlet entitled “Look Out for Lead” brochure. See also Lead-Based Paint Disclosure forms.
- Attaching specific disclosure and warning language to the leasing contract before the entity/household leasing the property/unit is obligated under a contract to lease the given property/unit
- Lead-based requirements apply to all units built before 1978 that are occupied or can be occupied by families with children less than 6 years of age or pregnant women. The Lead-Based Paint Rule has multiple subparts, and the applicability of the requirements varies depending on how the CoC Program funds are used. Visit HUD’s Lead-Based Paint website for more information.

*3.) Environmental Reviews*

All new and renewal CoC program projects require an environmental review and documentation of approval of the property by HUD before CoC program funds are committed. The level of review and documentation required varies depending on the type of activities that are funded by the grant.

HUD subrecipients such as the CAC should work with their local government partners and HUD to identify the type of review required and the Responsible Entity (RE) authorized to conduct the environmental review. CAC must maintain documentation and approval of the review as part of each project’s records. It is important to remember that no CoC Program funds can be used for the property until the environmental review is completed. HUD has published an environmental review flow chart for the CoC program. More information about environmental review requirements for CoC program projects can be found on HUD’s Environmental Review website.



#### 4.) Fair Market Rate/Rent Reasonableness Policy and Procedure

##### Rent Approval

The rent reasonable approval for a file is a two-step approval process. The rent of the current unit that is to be approved with funds for direct assistance must be at or less than:

1. FMR (Current rent plus calculated utility allowance)
- AND**
2. Rent Reasonableness (Current rent compared to other comparable units within the area)

##### Fair Market Rent Process & Procedures

1. CAC staff verifies the current rent (without any washer/dryer, pet fees, late fees, etc.).
  - Use most recent lease and/or lease extension documentation provided for the file. If there are any discrepancy and/or questions that arise, the landlord is called directly for additional clarification which is documented in the case notes.
2. CAC staff verifies FMR using the most recent Fair Market Rent sheet found for the correct county, found in SharePoint.
3. CAC staff calculates the Utility Allowance (UA), which is used to determine gross rent (HUD Interim Rule, p. 77; CFR 1.42-10).
  - a. CAC staff may calculate the Utility Allowance (UA) based on the following sources released each year:
    - the local Public Housing Authority's schedule of utility allowances:
      - within the City of Madison; the schedule for the Community Development Authority (CDA)
      - in rural Madison; the schedule for the Dane County Housing Authority (DCHA)
    - HUD Utility Schedule Model (HUSM) – Form HUD-52667 (<https://tools.huduser.gov/husm/uam.html>)
    - other public sources of data, such as the Wisconsin Degree Days Zone Map (<https://tools.huduser.gov/husm/uam.html>).
      - Zone 10: Dane and Jefferson counties
      - Zone 11: Waukesha County
  - b. Type of housing unit, such as multi-unit structure or apartments; duplex, townhouse or row-house; detached units or single-family house which is on the appropriate UAs; and;

- c. Bedroom size of the unit; and;
  - d. Utilities that the participant is or will be responsible for including but not limited to gas, electric, water/sewer, and hot water.
  - e. CAC staff is responsible for obtaining the information needed from the landlord which can be located on the Utility Allowance Information Sheet. These are updated each year with the FMR for the correct county and are completed at the time of leasing. Certain information can be obtained from the lease; however, it is common to verify unit type, size, and utilities verbally from the landlord. A UA is still completed even if utilities are included.
4. All verbal confirmation is documented in the case notes. The Utility Allowance Information Sheet and completed UA sheet are put filed in the participant file.
  5. CAC staff calculates the *total of the current rent plus UA*. This total is compared to the FMR of the applicable area: Dane, Jefferson and Waukesha counties.
  6. CAC staff goes back to finish final calculations in the Income, Rent & Utility Calculation Worksheet.

**IF RENT IS AT OR BELOW THE COUNTY FMR, THE 1<sup>ST</sup> HALF OF THE RENT APPROVAL PROCESS IS DONE.**

Rent Reasonableness Process

The rent reasonableness standard, mandated by HUD, is designed to ensure that rental payments are reasonable in relation to rents being charged for comparable, unassisted units in the same market. In addition to meeting Fair Market Rent for the participant's county, the unit must also adhere to the reasonableness standard. For projects funded by the CoC Program, all units and structures for which rent is paid must be reasonable (24 CFR 578.51(g)).

The process for rent reasonableness is as follows:

1. CAC staff will find advertisements for similar, vacant units using lists, newspapers, and/or the Internet. Advertisement and/or lists are printed with relevant information such as amount of bedroom size, square feet, location, utilities, amenities, etc. Assisted units, either current or within the past year, can be used as comparable. To document comparability, a copy of the lease is used.
2. Three other units found in the market are compared and must all be below FMR.
3. The Utility Allowance (UA) schedules sourced as described above are used to complete the utility allowances in the Utility Allowance Information Sheet. Utilities for all comparable units are added to the Rent Reasonableness Checklist.

4. The checklist is used to compare and certify compared units. If the units found are priced the same and comparable to the participant's potential unit, then rent will be considered reasonable.
5. If the landlord is willing, a written verification is signed by the property owner or the management company on CAC letterhead. The letter must verify that the rent for the unit in question is comparable to current rents charged for similar units managed by the same owner.

Copies of all back-up documentation on comparable units (print-outs, conversation notes, etc.) must be retained in the participant file with the FMR and Rent Reasonableness Checklist.

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#### NON-DISCRIMINATION POLICY

In accordance with 24 CFR 578.87(a)(b), CAC is committed to non-discrimination in programs and delivery of services. This means that no program participant will be excluded from services on any basis outside of program concerns. Programs and services are provided according to the needs of those to be served and the capacity, both financial and programmatic, of specific services provided to address those needs. CAC is committed to providing and welcoming environment for all staff, volunteers, vendors, and participants. See CAC's current Anti-Discrimination Policy and the Participant Agreement for practices consistent with the above regulation.

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#### HOMELESS PARTICIPATION

As part of CAC's development and delivery of services, CAC invites homeless individuals and families and CAC program participants to participate each year in a homelessness committee. The committee's outcome is to drive policy changes, funding priorities, and program implementation. This gives participants an opportunity to voice their opinions and concerns about homelessness and other issues that impact the community. These are then discussed and prioritized by the committee (24 CFR 578.87(c)).

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#### STATEMENT OF CONFLICT OF INTEREST

Organizational conflict of interest policies ensure that individuals do not participate in situations in which their relationship to the organization will prevent them from being impartial.

In addition to organizational conflict of interest policy, CoC-program projects such as those operated at the CAC are required to have an individual conflict of interest policy. This is to ensure that individuals associated with an organization do not exercise any responsibilities or participate in decisions that will result in personal benefit or gain. This prohibition continues for one year after the position has ended and includes the person, their family members, partner, and those they employ, unless an exception is granted by HUD or granting agency for a specific circumstance.

Please see Code of Conduct of Interest Policy in the CAC Personnel Policy Manual for practice consistent with 24 CFR 578.95.

## INDIVIDUALIZED CASE PLAN (ICP)

### *WHAT IS AN INDIVIDUALIZED CASE PLAN, AND HOW DOES IT WORK?*

Program participants receiving housing services require a Housing Stability Plan (see above). CAC also offers case management to its participants in the SHP and Project WISH programs, which involves meeting with the participant to develop an Individualized Case Plan (ICP). The purpose of an ICP is to address any challenges which might impair or inhibit the participant from obtaining and maintaining stable housing. The ICP must be collaborative, interactive and incorporate input from the participant regarding case goals. While case management is not required, it is highly encouraged by CAC caseworkers. CAC caseworkers will work to engage participants and continue to offer services that might meet their needs.

In some instances, housing programs are the first point of contact for individuals with social, economic, and educational barriers, as well as personal difficulties such as substance abuse or mental and emotional challenges. Social service providers refer their clients to housing programs to ensure a stable living environment that can support recovery and success. With these barriers facing a participant, the framework is developed in establishing the ICP. CAC refers to HUD-specific curriculum when entering a first-year program participant. CAC caseworkers are encouraged to visit this site for more information.

#### **To complete an Individualized Case Plan:**

- 1.) A Housing Stabilization Plan is first outlined and developed with the program participant. This plan makes explicit measurable goals, steps to achieve goals, timeframes for completion of the plan, and clear responsibilities for all parties involved (participant, case worker, other partners, etc.).
- 2.) The plan is written with input from the participant and must be based on the assessment conducted during the orientation process and in subsequent appointments with the participant.
- 3.) CAC caseworkers must ensure that the housing plan is signed by the participant, by themselves and reviewed by a Program Leader. Should a participant refuse to sign the plan, the refusal must be documented and followed with another attempt to secure the signature later.
- 4.) CAC caseworkers must ensure that the housing plan is updated at least monthly.
- 5.) All information must be documented in the Homeless Management Information System (HMIS), or ServicePoint. Hardcopy materials such as signed housing plans must also be placed in the participant file.

Case management involves giving participants choice in the supportive services received. They are asked about these choices and can choose from a range of services. Participants receive services on a case-by-case basis, meaning that service offerings are tailored to their unique needs and preferences. Rather than provide a limited menu of services for a specific location, CAC programs are designed to help participants define these needs and preferences. Therefore, CAC caseworkers develop an individualized case plan of support with participants which reflects these preferences. This is also a demonstrated *Housing First* practice.

No time limits are set for when intensive case management begins or ends. Even though case management is person-centered, the goal is to move participants towards self-sufficiency. To attain self-sufficiency, ICPs establish initial goals and when those goals are achieved, new goals could be set. Goal sheets are available during the process to spark ideas during caseworker-participant collaboration. Office and home visits are required to maintain supportive rapport with participants.

It is important for CAC caseworkers to always maintain professional boundaries while participants pursue goals and objectives established in their ICPs. Annual reviews of case management plans are also required.

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#### CASEWORKER EXPECTATIONS

CAC caseworkers are required to enter all participant data, including program activities and case notes, into ServicePoint and Salesforce. Salesforce is the agency-wide customer relationship management software used to collect and track this information. Additionally, CAC caseworkers must be licensed users of ServicePoint to use this database.

Upon taking a new referral from the prioritization list, CAC caseworkers should immediately report in ServicePoint that a potential participant is being screened. Upon acceptance of a participant into CAC programs, a record is entered in ServicePoint as well as in Salesforce within three to five days. Data is updated as needed. Monthly transactions are expected into ServicePoint, as well as yearly reviews.

CAC caseworkers should practice professionalism and a trauma-informed care approach to case management as well as applying harm reduction practices with participants who may have substance abuse concerns.

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#### SUPPORTIVE SERVICES

All CAC housing programs include supportive services; at a minimum, case management is offered. Supportive services differ by program. Programs in Balance of State and Dane CoCs should use the HUD Interim Rule (CoC) as a guide to eligible expenses. Other program offerings are found in the current application for participants' programs. Any questions regarding eligible expenses should be fielded to Program Leaders if the caseworker is ever in doubt.

Some eligible supportive services costs are:

- Annual assessment of service needs
- Assistance with moving costs
- Case management
- Child care (operating and vouchers) in licensed centers for eligible ages
- Education services
- Employment assistance and job training
- Food (meals or groceries for program participants)
- Housing service and counseling services
- Utility deposits
- Mental health services
- Transportation

## PROGRAM EXIT

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### SUCCESSFUL EXITS

Prior to exit, the CAC Caseworker and participant will have an ongoing dialog about exiting the program.

Occasions in which successful exit could occur:

- Participant has met their case plan goals.
- Participant is comfortable with exiting the program.
- Participant is aware of and/or has been successfully referred to other services or benefits.

A participant will be exited from a CAC program if any of the following occur:

- 1.) A participant becomes ineligible.
- 2.) A participant violates program participation requirements and fails to meet minimum corrective action goals.

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### OTHER EXIT TYPES

A participant will be exited from a CAC program if any of the following occur:

- 1.) A participant becomes ineligible.
- 2.) A participant violates program participation requirements and fails to meet minimum corrective action goals.
- 3.) A participant formally requests to discontinue participation in the program.

For all exits, the CAC caseworker will exit the participant in Salesforce as well as in ServicePoint, if applicable.

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### UNIT ABANDONMENT

If a participant abandons a unit, a CAC caseworker should post an abandonment notice on the door of the unit and mail the same notice to the unit address. When the unit is empty for 30 days from month-end, the caseworker may claim abandonment and exit the participant from the program in which they are enrolled. Brief periods of stays in institutions not exceeding 90 days are not considered vacancies (24 CFR 578.51 (i)).

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## TERMINATION

It is the policy of Community Action Coalition for South Central Wisconsin, Inc. (CAC) to provide a system for termination of participants to ensure that services are not terminated unless all options have been exhausted. Likewise, CAC will terminate participants from programs only when termination is determined to be necessary, as a last resort. All efforts will be made to keep participants enrolled where possible. Termination policies are outlined in the Participant Agreement that the participant signed and submits at intake.

The indications for termination include but are not limited to:

- Carrying weapons into the agency. Weapons include guns, knives, bats or any objects whose purpose could be for the infliction of emotional or physical pain or suffering on other human beings or damage to property owned by CAC or another person.
- Verbal threats against the safety or well-being of any participants, innocent bystanders or CAC staff. These include, but are not limited to, arson, physical attacks, bomb threats, and threats of litigation for reasons of manipulation.
- The theft of any property owned or rented by CAC or any person working or visiting CAC.
- Deliberate violation of the signed Participant Agreement. This may include failure to pay rent. The CAC caseworker will make every effort to collect late or missing rent, such as discussing payment arrangements with the participant.
- Falsifying information including, but not limited to, lack of reporting or disclosure of all income of the members of a household.

The following steps will be taken prior to the termination of a given participant:

- 1.) A verbal warning is given to the participant, who is contacted by the Program Leader to discuss.
- 2.) If the verbal warning is ineffective, a written warning is issued to the participant by the caseworker. The participant is expected to agree to the expectations, sign the agreement and fulfill the requirements for continuing to receive services.
- 3.) If the terms of the agreement are breached, the participant will be terminated. Notification of the termination is in writing, and a copy of the grievance policy for requesting a hearing will accompany each termination letter.
- 4.) Any threat to the health and safety of a CAC staff member, another participant or an innocent bystander, or the facility will result in immediate termination of services. If a participant's actions pose a health or safety risk to the participant or another person, CAC will also notify police or another appropriate authority.

Participants are not terminated from programs based on the following:

- Failure to participate in supportive services
- Failure to make progress on a service plan
- Loss of income or failure to improve income
- Being a victim of domestic violence



## EMERGENCY TRANSFER PLAN & PROTECTIONS FOR DOMESTIC VIOLENCE VICTIMS

In compliance with The Violence Against Women Act (VAWA), if a CAC program participant is a victim of domestic violence, dating violence, sexual assault, or stalking and the participant reasonably believes there is a threat of imminent harm from further violence, they may request an emergency transfer.

This request can be made if the domestic or dating violence, sexual assault or stalking incident occurred during a 90-calendar-day period preceding the date of the request. Requests for an emergency transfer may be made either written or verbally. If it is made verbally, the CAC caseworker will document the request in writing. A program participant can also request external emergency transfer to expedite the process. Within 24 hours of an emergency transfer, the following may occur:

1.) The program participant will be moved into a new unit, if available.

If a new unit is unavailable at the time, the following will occur:

2.) The participant will be relocated to a place deemed safe. This could be the home of a friend or family member or a domestic violence intervention service provider.

In Dane County:

**Domestic Abuse Intervention Services (DAIS)**  
located at **2102 Fordem Ave. in Madison, WI.**

For Jefferson and Waukesha counties:

**The Women's Center** located at **505 N East Ave. in Waukesha, WI.**

**PAVE Shelter** in **Beaver Dam, WI.**

3.) While the participant is in a safe location, the CAC caseworker will contact the Coordinated Entry System Manager to inquire about available units.

In Dane County, the caseworker may be to complete the CoC-approved transfer request form and submit it to the Coordinated Entry System Manager.

4.) If an external transfer is requested at the next appropriate placement meeting, the request will be made.

5.) If a unit cannot be located, other arrangements will be made for transitional or temporary housing.

In the case of an adult household of two individuals where the eligible participant is asked to leave, the remaining participant will have a period of 90 calendar days from the date of the eligible participant's departure to establish eligibility for a CAC housing program or an external program. If the household member is ineligible, they will be referred to another CAC program to find alternative housing. An extension of up to 60 calendar days may be granted as needed for housing navigation. Any denials of an extension will be documented and subject to CAC's Grievance and Appeals Policy. CAC will provide a written notice to the remaining household member of their rights.

*CAC will make every effort to keep the individual requesting an emergency transfer in the program; however, there is no guarantee that continued assistance will be available. CAC will also exercise discretion when requesting documentation supporting the occurrence of domestic violence, dating violence, sexual assault or stalking for which the emergency transfer is requested.*

## OPERATIONS

### POLICY STATEMENT

CAC provides participants with a fair and efficient process to present and resolve complaints and grievances. Participants have the right to present and resolve complaints and grievances with the CAC or the national in a timely manner. CAC staff is expected to adhere to the agency's Grievance and Appeals Policy.

### GRIEVANCE POLICY

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#### DEFINITION

CAC staff work to ensure that all participants in its programs are treated fairly and with respect. Participants may file a grievance when they feel they have been treated unfairly regarding procedure and/or that services requested were denied in violation of CAC procedures, applicable law, or conditions of the grant funding said services. These grievance procedures incorporate appropriate due process standards and provide for the prompt and equitable resolution of the grieved behavior.

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#### NON-RECRIMINATION

Staff shall not dissuade a program participant from presenting the grievance, complaint or appeal nor should staff retaliate in response to the participant having filed a grievance, complaint, or appeal.

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#### CONFIDENTIALITY

All forms and correspondence of the situation will be maintained in a confidential manner.

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#### GRIEVANCE & POLICY PROCEDURES

All forms and correspondence of the situation will be maintained in a confidential manner.

- 1.) Participants who feel they have not been treated fairly may discuss the situation immediately with the Program Leader of the individual division or, if the Program Leader is not immediately available, staff will provide the participant with the contact information of the Program Leader. The participant may communicate with the Program Leader either by telephone, email or mail. If the participant wishes to file a Grievance, it is the responsibility of the participant to contact the Program Leader. Staff is not to engage in any further discussion on the matter with the participant.

- 2.) Staff will notify the Program Leader of the potential grievance within 24 hours, documenting the circumstances and providing any other pertinent information.
- 3.) Once contacted by the participant, the Program Leader will either discuss over the telephone or meet with the participant to discuss the circumstances of the complaint. Notes of this conversation will be placed in the participant's file if there is one. If there is no case file, the Program Leader is to open an ad hoc file.
- 4.) If the complaint is due to a staff member's behavior and is found to be factual, the Program Leader will discuss the matter with the staff member and take appropriate disciplinary action.
- 5.) If the participant is not satisfied with the conversation with or response from the Program Leader, the participant will be referred to the Executive Director or the person that the Executive Director designates as responsible for handling grievances.
- 6.) The Executive Director or designee will review all documentation of all the actions taken to-date and will make a final attempt to resolve the situation with the participant as soon as possible.

If the participant is still not satisfied, the only remaining internal recourse is to begin the formal appeal process.

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#### FORMAL APPEAL PROCESS

All forms and correspondence of the situation will be maintained in a confidential manner.

The appeal process begins with the participant securing a "Participant Appeal Form" that is available upon request at all three of CAC's offices. If the Executive Director or designee is unable to resolve the matter to the participant's satisfaction, the Executive Director or designee should offer the Participant Appeal Form to the participant.

- 1.) The participant needs to complete and sign the Participant Appeal Form and mail it and any supporting documentation to the Executive Director or designee.
- 2.) If the participant completes the form at a CAC office, staff needs to route the form and any attachments to the Executive Director or designee within two days.
- 3.) Within two business days of receiving the completed Participant Appeal Form and any attachments, the Executive Director or designee is to contact the participant to acknowledge receipt.
- 4.) Within 20 business days of receipt of the written appeal and complete information, the Executive Director or designee will form an Appeal Panel from among the Board of Directors and schedule a meeting of the Panel for the presentation of the appeal.
- 5.) The Executive Director or designee will notify all Panel members and the participant as to the date/time/place of the meeting. The participant may bring any additional information or individuals to the meeting.

- 6.) At the Appeal Meeting, the Appeal Panel will review the Participant Appeal Form and any supporting documentation submitted with the Participant Appeal Form. The Appeal Panel will review any documentation that staff has submitted to the Executive Director or designee. The Appeal Panel will permit the participant or a representative of the participant to make a statement if they so wish. The Appeal Panel may ask questions of the participant or the participant's representative, or of the Executive Director or designee. The Appeal Panel will deliberate and make a determination.
- 7.) Within 30 business days of the meeting, a representative of the Appeal Panel will inform the participant in writing of the determination made by the Appeal Panel.
- 8.) The Appeal Panel will inform the full Board of Directors of the appeal and its determination at the next regularly-scheduled meeting of the Board.
- 9.) The Executive Director or designee will inform the Program Leader if there are any programmatic or disciplinary actions to be taken.

The determination reached by the Appeal Panel is the final internal, Agency determination.

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#### ADDITIONAL ACTION

All appeal-related information is stored in a secure location and maintained by the Executive Director.

Contact Information for Executive Director:  
Jim Schroeder, Executive Director  
(608) 246-4730 Ext. 217  
jschroeder@cacscw.org

## REPORTING AND RECORDKEEPING

### REPORTING

All reporting requirements are explained in detail in the contracts for grants supporting CAC’s programs and services. Refer to each contract’s Scope of Work (SOW) section for a respective grant project for more information.

### RECORDKEEPING POLICY

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#### POLICY STATEMENT

Participant privacy, confidentiality, and information security is guaranteed by CAC program staff and subcontractors. Participant information is “owned” by the participant, and CAC acts as a steward of this information. This is achieved by protecting this information from any use other than required for operation of the program. Participant information is not shared with any other entities without prior permission (i.e. a signed Release of Information (ROI)). CAC staff adheres to its Confidentiality Policy as part of the Personnel Policy Manual in Appendix 11.

All paper records are retained in accordance with CAC’s Record Retention Policy. An excerpt of this policy as it relates to Supportive Housing Programs follows:

**Program Information:**

Financial Assistance Participant Files ..... 7 years on paper; permanently on internal database  
Case Management Files ..... 7 years  
Intake Participant Files ..... 6 years  
Participant Complaints ..... 3 years after resolution  
General Participant Files ..... 3 years

During the orientation and intake process, any verification documents not used are shredded. Participant files are stored a secure location at each CAC office. CAC staff reviews participant files every year and safely disposes of expired files.

## CONFIDENTIALITY, PRIVACY, AND SECURITY

To maintain uphold confidentiality, disclosure by an employee of any information concerning a program participant is prohibited except with the participant's informed, written consent or the consent of the participant's legal guardian. Confidentiality may be breached when disclosure is necessary to prevent serious, foreseeable and imminent harm to a participant or other identifiable person or when laws or regulations require disclosure without the participant's consent.

- In all instances, CAC staff will disclose the least amount of confidential information necessary to achieve desired purpose. Only information that is directly relevant to the purpose for which disclosure is made will be revealed.
- CAC staff fully informs participants about the disclosure of confidential information and any possible consequences, before the disclosure is made. This applies whether information is disclosed based on legal requirement or participant consent.
- CAC staff discusses with participants the nature of confidentiality, and limitations of participants' rights to confidentiality.
- CAC staff reviews with participants the circumstances where confidential information may be requested and where confidential information may be legally required. This discussion occurs as soon as possible in the staff-participant relationship and as needed throughout the course of the relationship.
- No confidential information is disclosed to external parties unless participants have authorized such by signing a Release of Information (ROI) form.
- Participants sign a CAC and a Wisconsin ServicePoint (WISP) Release of Information.
- Participants are informed that the Release of Information is effective until they notify CAC otherwise.
- If an inquiry is received about a program participant who may be receiving services from CAC, CAC staff does not confirm or deny information about the client. The inquirer is asked to contact the person about whom they are inquired and obtain a signed Release of Information (ROI). Receipt of the release must be received by CAC prior to any disclosures made.
- CAC staff does not discuss confidential information in any setting unless privacy is ensured. Staff will not discuss confidential information in any public or semi-public areas including, but not limited to, hallways, waiting rooms, elevators, and restaurants.
- CAC staff protects the confidentiality of participants' written and electronic records, and other sensitive information. Staff takes reasonable steps to ensure participants' records are stored in a secure location and unavailable to those not authorized to their access.

- CAC staff takes precaution to ensure and maintain the confidentiality of information transmitted to other parties using computers, electronic mail, fax machines, telephones and voicemail, and other electronic or computer technology. Disclosure of identifying information is avoided whenever possible.
- CAC staff transfers or disposes of participant records in a manner that protects participants' confidentiality and is consistent with state statutes and funding requirements.
- CAC staff does not disclose identifying information when discussing participants for teaching or training purposes, unless the participant has consented in writing to the disclosure of this information.
- CAC staff does not discuss identifying information when discussing participants with consultants, unless the participant has consented in writing to the disclosure of this information or there is a compelling need for disclosure.
- CAC staff protects the confidentiality of deceased participants consistent with the above standards.

#### RELEASE OF INFORMATION (ROI)

During the orientation and intake process, a valid and current Release of Information (ROI) form is signed by the head of household for all program participants. The ROI shall be maintained in the participant file. In cases where an ROI has not been obtained but the client has verbally consented to release of information, this authorization can be documented in the file. Information can then be released to the appropriate individual or organization for a period of up to three business days after which a signed ROI must be obtained and stored in the participant file.

#### SECURITY OF PHYSICAL RECORDS

Hardcopy records containing client information are secured by CAC and its subcontractors. These records are maintained in each CAC location, and access is restricted to authorized use and personnel. Participant records are stored in secure rooms, and during non-business hours, CAC offices are locked as well.

#### E-MAIL SECURITY

Employee e-mails never include identifiable client information such as name, date of birth, and social security number. Emails referring to participants only use numeric client identifiers (i.e. the 5-digit client ID from ServicePoint or direct links to program activities). If there is not a unique client identifier, initials of a participant can be used as an acceptable substitute. When communicating with an external entity that may be unfamiliar with client identifiers, the preferred method is direct verbal communication.



## VOICE SECURITY

Reasonable care is exercised when communicating participant information in discussions, face-to-face or by phone to ensure client privacy, confidentiality, and information security are preserved. No client information is discussed in-person, in voicemails or voicemail messages, or in e-mails with individuals and organizations if the participant has not granted permission (i.e. ROI).

## DATA SECURITY

Computers and electronic devices such as tablets or smartphones used by CAC staff are password protected. Files with client information are never stored on personal devices. Unencrypted “flash” or “thumb” drives are prohibited for storage of client data. Salesforce and ServicePoint are the only approved repositories for client information. Care is exercised to avoid creating and retaining intentional or unintentional copies of files, such as regularly purging download files or using other methods of data clean-up.

## WISCONSIN SERVICEPOINT POLICIES & PROCEDURES

Wisconsin ServicePoint (WISP) is administered through the State of Wisconsin and the Institute for Community Alliances (ICA). WISP is the HMIS (Homeless Management Information System) used by all homeless service providers in the state of Wisconsin. A list of active agencies who use HMIS is given [here](#).

There is one CAC staff member who acts as the administrator for CAC. The administrator is responsible for updating current provider information, creating new providers when programming is developed, and assisting users with password issues. The current administrator is the **Systems & Procedures Specialist**.

All WISP users (i.e. CAC caseworkers) must complete and agree to a WISP User Agreement upon completion of required user trainings. All agency WISP user agreements are electronic and kept on file with ICA. A WISP Consumer Notice is published on CAC's website, and the consumer notice regarding WISP participation is posted in the lobby area of all CAC locations as well as in CAC staff office spaces. The WISP privacy policy is available upon request.

Pursuant with funding requirements, CAC program participants are required to complete and sign a [Release of Information](#) for WISP entry if the funding being used for program in which they enroll or intend to enroll in requires WISP entry. As part of the release, participants are given options for preferences of information sharing. Based on signed participant preferences in the WISP Release of Information, the applicable information is entered into WISP by CAC staff. All data entered is completed in a timely manner (within five days of program entry) to remain compliant with contractual obligations. The signed Release of Information remains in the participant file to ensure confidentiality.

Information regarding participants remains confidential and is only viewed for audit purposes, during program entry/exit, for reference, and for use in the correction of data entry errors. Reports are periodically generated by Program Leaders and by the administrator from the Advanced Reporting Tool (ART) module to identify any data entry errors. The ART module is also utilized to run monthly, quarterly and yearly reports for all grants that require WISP entry. Currently, CAC strives for 100% data completeness; CAC minimum standards are 98% and ICA minimum standard are 95%. ART reports are also used for data collection for required grant fund reporting, gathering information for each CoC groups (as needed), as well as collecting information for prospect grant opportunities.

CAC follows the current [HMIS Policy & Procedure Manual](#) developed by ICA to uphold HMIS data standards.

## EDUCATIONAL NEEDS OF FAMILIES POLICY

Pursuant to CFR 578.23(c)(7), CAC considers the educational needs of children and families, especially those vulnerable due to homelessness of any kind. This includes housing families with children as close as possible to their school of origin so as not to disrupt such children's education.

CAC informs households of the educational rights of children in its programs. These rights are explained to families at program entry when a family's housing needs are assessed. During intake, our caseworkers discuss whether the children's school is in the same district as an available unit. If the family wishes to keep the children in their school of origin, CAC works with the children's school social worker to coordinate educational support services through the **Transition Education Program (TEP)**. Reference materials (leaflets, brochures) furnished by TEP are made available to families as needed and are also found in the lobby of all CAC offices.

CAC's caseworkers, who work with families through housing and case management intervention, must document any issues observed related to school attendance or truancy, make referrals to the children's school social worker, and may offer additional financial support if it is an eligible service under 24 CFR 578.53.

## LIMITED ENGLISH PROFICIENCY POLICY

### DEFINITION & PROCEDURES

Any CAC program participant who does not speak English as their primary language and who has a limited ability to read, write or speak English.



In accordance with 24 CFR 576.407(b), CAC provides language access services to populations of persons with limited English proficiency who are eligible to be served by CAC's programs and service. The service is currently offered by Certified Language International (CLI).

For more information, visit <https://www.certifiedlanguages.com/>.

If a program participant needs an interpreter, the following procedures apply:

- 1.) Dial 1-800-CALL-CLI (1-800-225-5254).
- 2.) When the operator answers, tell them:

- a. The customer code (27736)
  - b. Where you are calling from (name of program)
  - c. The language needed
  - d. The **agency name** and **caller's name**
  - e. If a third-party dial-out is required
- 3.) The operator will connect the caller promptly.

For Outbound Calls:

- If an interpreter is needed for a Limited English Proficient (LEP) at home or needs a third-party dial-out, please inform the CLI representative before the interpreter is connected.
- Once the interpreter is connected, the caller may tell the interpreter the LEP's name.
- At this time, the caller can also tell the interpreter how to proceed if the call goes to voicemail and what message to leave, if desired.

For Inbound Calls:

- Explain to the LEP that all information is confidential and encourage them to ask questions.
- Speak clearly.
- Smile and be kind; this helps the LEP feel more comfortable and at ease.
- If face-to-face and multiple people are in the room, speak one at a time.
- Speak freely; all CLI interpreters are sworn to confidentiality, neutrality, and the Interpreter Code of Professional Ethics.
- Encourage the interpreter to clarify terms, if necessary.

Language translation services are available to CAC caseworkers, staff and participants. These are entered as program expenses, therefore CAC's procedures for completing and submitting Purchase Requests (PR) applies.

## FREQUENCY USED TERMS, DEFINITIONS, AND CHARTS

The following terms and definitions are taken from pp. 52-58 of the [HUD Interim Rule \(CoC\)](#), and apply to Continuum of Care programs in both Dane and the Balance of State regions:

### **At risk of homelessness:**

(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 of 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 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a healthcare 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. 14043e2(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.

**Centralized or coordinated assessment system (Coordinated Entry)** means a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area is easily accessed by individuals and families seeking housing or services, is well advertised and includes a comprehensive and standardized assessment tool.

**Chronically homeless:**

(1) An individual who:

(i) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

(ii) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and

(iii) Can be diagnosed 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;

(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 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) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

**Consolidated plan** means the HUD-approved plan developed in accordance with 24 CFR 91.

**Continuum of Care and Continuum** means the group organized to carry out the responsibilities required under this part and that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based

organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.

**Developmental disability** means, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002):

(1) A severe, chronic disability of an individual that—

(i) Is attributable to a mental or physical impairment or combination of mental and physical impairments;

(ii) Is manifested before the individual attains age 22;

(iii) Is likely to continue indefinitely;

(iv) Results in substantial functional limitations in three or more of the following

areas of major life activity:

(A) Self-care;

(B) Receptive and expressive language;

(C) Learning;

(D) Mobility;

(E) Self-direction;



(F) Capacity for independent living;

(G) Economic self-sufficiency.

(v) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated. (2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of the definition of "developmental disability" in this section if the individual, without services and supports, has a high probability of meeting these criteria later in life.

**Eligible applicant** means a private nonprofit organization, State, local government, or instrumentality of State and local government.

**Emergency shelter** is defined in 24 CFR part 576.

**Emergency Solutions Grants (ESG)** means the grants provided under 24 CFR part 576.

**Fair Market Rent (FMR)** means the Fair Market Rents published in the Federal Register annually by HUD.

**Homeless** means:

(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, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or

(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.

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

**Permanent housing** means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. To be permanent housing, the program participant 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 one month long, and is terminable only for cause.

**Permanent supportive housing** means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

**Private nonprofit organization** means an organization:

(1) No part of the net earnings of which inure to the benefit of any member, founder, contributor, or individual;

(2) That has a voluntary board;

(3) That has a functioning accounting system that is operated in accordance with generally accepted accounting principles, or has designated a fiscal agent that will maintain a functioning accounting system for the organization in accordance with generally accepted accounting principles; and

(4) That practices nondiscrimination in the provision of assistance.

A private nonprofit organization does not include governmental organizations, such as public housing agencies.

**Program participant** means an individual (including an unaccompanied youth) or family who is assisted with Continuum of Care program funds.

**Project** means a group of eligible activities, such as HMIS costs, identified as a project in an application to HUD for Continuum of Care funds and includes a structure (or structures) that is (are) acquired, rehabilitated, constructed, or leased with assistance provided under this part or with respect to which HUD provides rental assistance or annual payments for operating costs, or supportive services under this subtitle.

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

**Transitional housing** means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended.

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

<b>ELIGIBILITY BY COMPONENT</b> CoC Program-funded projects	<b>Supportive Services Only</b>	Individuals and Families defined as Homeless under the following categories are eligible for assistance in SSO projects: <ul style="list-style-type: none"> <li>• Category 1 – Literally Homeless</li> <li>• Category 2 – Imminent Risk of Homeless</li> <li>• Category 3* – Homeless Under Other Federal Statutes</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul>
	<b>Safe Havens</b>	Individuals defined as Homeless under the following categories are eligible for assistance in SH projects: <ul style="list-style-type: none"> <li>• Category 1 – Literally Homeless</li> </ul> <p>SH projects have the following additional NOFA limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> <li>• Must serve individuals only</li> <li>• Individual must have a severe mental illness</li> <li>• Individual must be living on the streets and unwilling or unable to participate in supportive services</li> </ul>
	<b>Transitional Housing</b>	Individuals and Families defined as Homeless under the following categories are eligible for assistance in TH projects: <ul style="list-style-type: none"> <li>• Category 1 – Literally Homeless</li> <li>• Category 2 – Imminent Risk of Homeless</li> <li>• Category 3* – Homeless Under Other Federal Statutes</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul>
	<b>Permanent Supportive Housing</b>	Individuals and families defined as Homeless under the following categories are eligible for assistance in PSH projects: <ul style="list-style-type: none"> <li>• Category 1 – Literally Homeless</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul> <p>PSH projects have the following additional NOFA limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> <li>• Individuals and Families coming from TH must have originally come from the streets or emergency shelter</li> <li>• Individuals and Families must also have an individual family member with a disability</li> </ul> <p>Projects that are dedicated chronically homeless projects, including those that were originally funded as Samaritan Bonus Initiative Projects must continue to serve chronically homeless persons <u>exclusively</u></p>

\* Projects must be located within a CoC that has received HUD approval to serve this category. For more information about receiving HUD approval, please read: [Notice on Limitation on Use of Funds to Serve Persons Defined as Homeless Under Other Federal Laws](#)

<b>ELIGIBILITY BY COMPONENT</b> ESG Program-funded projects	<b>Street Outreach</b>	<p>Individuals defined as Homeless under the following categories are eligible for assistance in SO:</p> <ul style="list-style-type: none"> <li>• Category 1 – Literally Homeless</li> <li>• Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)</li> </ul> <p>SO projects have the following additional limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> <li>• Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter</li> </ul>
	<b>Emergency Shelter</b>	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in ES projects:</p> <ul style="list-style-type: none"> <li>• Category 1 – Literally Homeless</li> <li>• Category 2 – Imminent Risk of Homeless</li> <li>• Category 3 – Homeless Under Other Federal Statutes</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul>
	<b>Rapid Re-housing</b>	<p>Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> <li>• Category 1 – Literally Homeless</li> <li>• Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)</li> </ul>
	<b>Homelessness Prevention</b>	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in HP projects:</p> <ul style="list-style-type: none"> <li>• Category 2 – Imminent Risk of Homeless</li> <li>• Category 3 – Homeless Under Other Federal Statutes</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul> <p>Individuals and Families who are defined as At Risk of Homelessness are eligible for assistance in HP projects.</p> <p>HP projects have the following additional limitations on eligibility with homeless and at risk of homeless:</p> <ul style="list-style-type: none"> <li>• Must only serve individuals and families that have an annual income <u>below</u> 30% of AMI</li> </ul>

