

A Way Home For Tulsa

Written Standards for Providing Continuum of Care Assistance

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Attachment A – HUD Permanent Supportive Housing Prioritization Chart (REF: CPD-14-012 July 2014)

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In conjunction with the recipients of ESG funds within the Tulsa area and in accordance with the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 ("HEARTH Act") amendment to the McKinney-Vento Homeless Assistance Act and the Department of Housing and Urban Development's ("HUD's") Interim Rule, the Continuum of Care known as A Way Home for Tulsa ("Continuum" or "CoC" or "AWH4T") adopts the following guidelines. These guidelines will govern the application of the coordinated (or "common") assessment system that has been created to provide an initial, comprehensive assessment of the needs of individuals and families for housing and homeless support services. The CoC's common assessment system's primary emphasis is on providing proper referrals for emergency shelter, Rapid Re-Housing ("RRH"), Transitional Housing ("TH") and Permanent Supportive Housing ("PSH"). Pertaining to the latter, the Housing First concept will apply. Based on the CoC regulations at 24 CFR Subpart B § 578.7, the policies described herein apply to all members of the Continuum unless specific reference to Emergency Solutions Grant- ("ESG") requirements is made.

Coordinated (or "Common") Assessment and Referral System -

The common assessment and referral system developed by the Continuum of Care known as A Way Home for Tulsa ("CoC" or "Continuum" or "AWH4T"), in conjunction with local ESG-funded programs' input, was created to assess the needs of homeless individuals and families or those at risk of homelessness and match those needs to the most appropriate housing or service alternatives. All CoC- and ESG-funded programs are required to utilize the CoC common assessment system. If attempts at diversion or prevention do not solve a person's or family's housing problem when initially presenting to the homeless service provider, the intake staff at the "no wrong door" point of entry can then proceed with an interview of the participant to ascertain the best immediate housing options within the Continuum. The most current version of the Vulnerability Index & Service Prioritization Decision Assistance Tool ("VI-SPDAT") will be utilized as part of the initial screening process to gather enough information concerning the stability and acuity of the presenting individual. The interviewer will ask the participant a series of questions from the VI-SPDAT that are designed to identify the conditions affecting the individual's ability to secure or maintain housing. Information regarding such domains as housing history/status, physical health, mental health, substance abuse and other general risk factors will be gathered to assemble the risk profile necessary to assess the participant's vulnerability and level of need. All information from the participant will be self-reported, although surveyors conducting the interviews can also register their own impressions of the presenting participant's condition on the VI-SPDAT. Should the participant refuse to answer the questions posed in the VI-SPDAT, the interviewer will note that fact in HMIS. The intake staff will then have the discretion to do either one of the following:

- Complete the surveyor observation questions contained within the VI-SPDAT without participant input
- Refer the participant to another homeless service provider
- Elect to initiate an intervention.

Should the presenting participant(s) be fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, the non-victim service providers in the Continuum will refer the victim to an appropriate shelter program that specifically targets such groups. Until the protection of one of these organizations can be assured, special care will be taken to ensure that the victim is afforded a secure environment within the intake provider's organization and that the security of the participant's identity and privacy are given special consideration. This could include reserving a private area within the accepting agency's location or the creation of a special track within the assessment framework that is specifically designed for domestic violence victims.

Evaluating Individuals or Families Eligible for Assistance –

Eligibility to receive assistance under all CoC-funded programs will be based on the guidelines outlined by HUD, initially by determining if the individual or family qualifies as "homeless" as defined in the HEARTH Act of 2009, § 103 or as "at-risk of homelessness". Evaluation and eligibility policies and procedures are developed in accordance with the Continuum's common assessment requirements set forth under § 578.7(a)(8) of HUD's Interim Rule that governs the regulatory implementation of the CoC program. Additional clarification regarding the prioritization of persons experiencing chronic homelessness and other vulnerable homeless persons in permanent supportive housing as contained within HUD's Notice CPD-14-012 is incorporated by reference (see Attachment A).

All homeless services, including diversion and prevention, will be provided on the basis of the relative need of each presenter. To receive homeless prevention assistance, the applicant must be "at risk of homelessness" at the time assistance is requested. To receive RRH, emergency shelter or street outreach assistance, HUD funded providers must ensure that the applicant is "homeless" at the time assistance is requested. As mandated in the most recent Notice of Funding Availability, AWH4T will "prioritize those who are identified as most in need (e.g., those who have been living on the street the longest, homeless households with children living in unsheltered situations, those that are considered most medically vulnerable, etc.) for placement into appropriate housing."

The members of the Continuum and local ESG-funded program subrecipients will work together to identify which eligible persons could benefit the most from assistance. Upon initial evaluation, the type and amount of assistance deemed appropriate will be offered to ensure the individual's or family's needs are met to regain housing stability. A homeless service provider may develop and follow its own internal policies and procedures that further outline the evaluation methods for the project it is administering. When determining the annual income of an individual or family, the homeless service provider must use the standards for calculating annual income under 24 CFR 5.609 and 24 CFR 5.611(a). Other resources like Federal, State, local, and private assistance available in obtaining housing stability may also be considered.

When determining eligibility for short- and medium-term rental assistance, no program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources is eligible, except for a one-time payment for up to six (6) months of rental arrearages and late fees, if applicable, on the ESG program tenant's portion of the rent. The participant's eligibility for assistance, and the types and amounts of assistance to be given, will be evaluated at least every three (3) months for individuals or families receiving homeless prevention assistance and annually for those receiving rapid re-housing assistance.

Local Coordination of Shelters and Service Providers –

The CoC network of homeless service providers will provide coordinated services that minimize any duplication of services in order to serve the most participants possible. Tulsa's Homeless Services Network ("HSN") and Continuum members meet regularly to discuss issues such as evolving trends, challenges and funding fluctuations in an effort to facilitate coordination between local homeless service providers and shelters. A program called "Fresh Start", created to assist coordination between local shelters, public officials, religious organizations and other entities that interact with homeless individuals and families, also meets regularly as a case conferencing body to discuss specific cases and share information necessary to aid the homeless and those at risk of homelessness. In addition, the Continuum will, to the maximum extent practicable, coordinate and integrate information with outside agencies and organizations that provide similar services or mainstream support within the community.

Determining & Prioritizing Eligibility Based on Local Characteristics -

CoC members will carefully assess how their own program resources can best be used to prevent and end homelessness. Information gained from HMIS data, staff observations, available funding streams, and a community-wide assessment of the need for and availability of interventions to serve individuals and families experiencing homelessness will be used to inform these assessment efforts. Assistance may be provided for those program participants who meet the RRH criteria of homeless under the HEARTH definition. Homeless support services are offered to all other program participants that are at risk of homelessness.

Rapid re-housing and homeless prevention assistance will be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR § 578.53 or the short- and medium-term rental assistance requirements in 24 CFR § 578.37.

Homeless individuals and families that are identified as belonging to certain populations, such as domestic violence victims, youth or veterans, will be provided additional assistance at local emergency shelters with programs specifically created to serve them. Those shelters that serve these populations will prioritize the delivery of services based on the particular needs of the specific population being served, as outlined in those agencies' policies.

The CoC and ESG network members work together to establish standard criteria for prioritization based on the local characteristics in the Tulsa area. Characteristics recently identified in this area that were most prevalent were unemployment, health problems (physical, mental and dental), single adults with and without children, criminal records, lack of transportation and a history of substance abuse treatment. Through its collaboration with the Homeless Services Network ("HSN"), the CoC follows the Housing First philosophy for its RRH programs, as identified in Opening Doors: the Federal Strategic Plan to End Homelessness, in that, it considers it a priority to connect people to housing with the resources necessary to sustain housing and to facilitate the Tulsa community's accomplishment of its RRH goals of ending homelessness, reducing emergency shelter stays, limiting recidivism and documenting outcomes.

A review of the participant's needs may result in one of the following possible outcomes:

- Shelter stay – a short term stay (usually overnight) with minimal support services or financial assistance
- Transitional housing – Housing, the purpose of which is to facilitate the movement of individuals and families experiencing homelessness to permanent housing within twenty-four (24) months or longer. To be qualified for TH, program participants must have signed a lease or occupancy agreement with the HUD-funded agency that is for a term of at least one month and that ends in twenty-four (24) months. The lease or agreement cannot be extended without HUD approval.
- Rapid Rehousing – CoC funds may be used to provide supportive services and short-term and/or medium-term tenant-based rental assistance to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in housing. RRH project participants must meet with a case manager not less than once per month, as set forth in the Interim Rule's § 578.37(a)(1)(ii)(F), except where prohibited by the Violence Against Women Act ("VAWA") and the Family Violence Prevention and Services Act ("FVPSA"). A full range of supportive services can be provided for up to six (6) months after the rental assistance stops. Although program participants may receive short-term or medium-term rental assistance under the HUD CoC programs that match the time frames set forth in the ESG programs, the supportive services available to program participants receiving RRH assistance under the CoC program are not limited to housing relocation and stabilization services as they are in the ESG program.
- Permanent supportive housing – While the term "permanent housing" means community-based housing without a designated length of stay and includes both permanent supportive housing and rapid re-housing, PSH is housing in which supportive services are provided to assist homeless persons with a disability to live independently. And, just as for permanent housing, the PSH program participant must be the tenant on a lease or sub-lease for a term of at least one year (renewable in at least monthly increments) and the lease may only be terminable for cause. The chronically homeless within these populations will always be given priority.

Determination of Participant's Share of Costs –

The Continuum's homeless service providers work closely with participants to determine what portion of rent and utility costs, if any, the participants will be required to pay. Fee structures are based on challenges associated with homelessness in Tulsa, the availability of resources within the community, and existing housing and economic conditions. Each program participant on whose behalf rental assistance payments are made must pay a contribution toward rent in accordance with § 3(a)(1) of the U.S. Housing Act of 1937 (42 U.S.C. 1437 A(a)(1)). Further, 24 CFR Subpart D § 578.37 (a)(ii)(B) stipulates that when the participant's share of the rent is being determined, a monthly utility allowance using standards set by the local housing authority may be considered part of the rent. More restrictive guidelines may be placed on the portion of assistance by the agency administering the grant.

Determination of Participant's Responsibility and Length of Time for Rental Assistance –

Subject to program funding availability, participants eligible for homeless support services and RRH rental assistance may receive assistance for a maximum of twenty-four (24) months of assistance in a three (3) year period. Short-term assistance may be used for up to three (3) months' rent and medium-term assistance may be used for no more than twenty-four (24) months' rent. Accrued rental arrearages for ESG-funded programs may be paid for up to six (6) months' worth of rent, including any late fees on those arrearages. Guidelines to determine changes in assistance amounts that may become necessary over time will be established in conjunction with the homeless service providers administering the program. Both tenant- and project-based rental assistance is allowed for ESG programs while only tenant-based programs are allowed under CoC programs. Tenant-based participants must have a lease that is for a period of at least one year, regardless of the length of rental assistance, that is renewable for a minimum term of one month and is terminable only for cause.

Eligible RRH financial assistance may include the following:

- Rent or utility obligations in arrears up to six (6) months for ESG funded programs only per ESG Interim Rule (24 CFR §576.106 (a)(3))
- Application fees
- Security deposits in an amount not to exceed two (2) months' of rent
- Utility deposits and monthly utility payments. For ESG- funded programs only, utility arrearages may be paid.
- Rent for up to twenty-four (24) months provided the participant is not receiving any other federal, state or local rent subsidies. ESG-funded programs may also pay delinquent rent or fees.
- Moving costs
- Other supportive services allowed under CoC-funded programs per 24 CFR § 578.53

Determination of Housing Stabilization and/or Relocation Type, Amount and Duration –

The amount of assistance provided will be determined by the homeless service provider and the participant upon review of funding allocations. Housing stabilization and/or relocation assistance may be provided in the form of security deposits, utility payments, moving assistance and case management depending on the form of assistance agreed upon by the participant and homeless service provider. If security deposits are paid, they may be equal to no more than two (2) months' rent. The last month's rent may be paid to the landlord not to exceed the amount of one month's rent. Utility payments may be paid for up to twenty-four (24) months of service, including up to six (6) months of utility payments in arrears for ESG-funded programs. When paying participants' moving costs, payment of temporary storage may be paid for up to three (3) months after the date the participant begins receiving ESG services and before the participant moves into permanent housing. Housing stability case management assistance for ESG-funded programs may not exceed thirty (30) days during the period the program participant is seeking permanent housing and may not exceed twenty-four (24) months during the period the program participant is living in permanent housing. More restrictive guidelines may be placed on the duration of assistance by the agency administering the grant.

Compliance with CoC standards of operations –

The Continuum will consult with local ESG funded programs to determine how to best allocate CoC funds for each program year and will develop and update performance standards for, and evaluate outcomes of, projects and activities assisted by ESG funds. This cooperative form of service delivery necessitates close communication and coordination with mainstream programs for housing, health, social services, employment, education and youth for which homeless families and individuals or those at risk of homelessness may be eligible.

With the exception of victim service providers, CoC- and ESG-funded homeless service providers will participate in the ShareLink Homeless Management Information System ("HMIS"), the CoC designated information system, to report data for their respective programs according to the HUD HMIS Data Standards. Victim service providers will use a separate database to collect participant-level data without interfacing or sharing data with HMIS. The CoC reviews quarterly reports to monitor outcomes and inform funding priorities. AWH4T organizations will designate staff persons responsible for ensuring that dependent children are enrolled in school and connected to the appropriate services within the community, including early childhood education programs such as Head Start, Part C of the Individuals with Disabilities Education Act and McKinney-Vento education services. All CoC-funded members will provide housing for the entire family regardless of the age of its children and will actively collaborate with local school districts and early childhood education providers to identify homeless households with children to ensure they understand their eligibility for educational services. In alignment with McKinney-Vento requirements, homeless service

providers will notify families of the ability of school districts to provide transportation services to keep the children in their school of origin and will assist in the coordination of this service for the children as appropriate. ESG funded program entities may be involved in this effort.

Federal Fair Housing policies with regard to equal access to housing in HUD programs regardless of sexual orientation or gender identity as found in 24 CFR Parts 5, 200, 203, 236, 400, 570, 574, 882, 891 and 982 and the current NOFA will be followed.

CoC Policy on Evaluating ESG Projects -

The CoC consults with the City of Tulsa Grants Administration in the establishment of ESG priorities, policies and performance standards. In compliance with HEARTH regulations and the City of Tulsa Ordinance #22813 dated 2/13/2013, the CoC and the ESG-funded programs in the City of Tulsa will:

- Coordinate regarding homeless needs and ensure that the approved policies meet the needs, priorities, goals and outcome measures of the local homeless services providers.
- Mutually consult with each other regarding allocation of funding, developing performance standards and evaluating outcomes of ESG assisted projects.

A CoC representative appointed by the Mayor of the City of Tulsa will serve on the City's HUD Community Development Committee that is tasked with assessing local community housing needs and setting the priorities and standards for allocation of ESG funds.

Centralized Information and Referral -

Organizations may refer participants to 2-1-1 Helpline when appropriate to access services such as its Housing Referral Guide that can ease the burdens faced by those that are homeless or at risk of homelessness and possibly defer or prevent a homeless event altogether. 2-1-1 Helpline is also the central point of entry and screening for the VA-funded Supportive Services for Veteran Families ("SSVF") providing Rapid Rehousing and homeless prevention assistance for veterans. 2-1-1 conducts initial screening and service matching and makes follow-up appointments with SSVF Housing Navigator staff for further assessment and verification.

Pathways is a coordinated case management system targeting long-term and chronically homeless persons in Tulsa. This program focuses on a Housing First philosophy and rapid rehousing of individuals, utilizing an intensive, inter-agency case management approach to quickly coordinate needed support services while accessing housing. Case managers and homeless outreach staff make referrals to the Pathways HUB, the centralized administrative infrastructure for this program. The Pathways HUB staff conducts intake and assessment, confirms eligibility and has final admission authority for entry into the program.

HUD Permanent Supportive Housing Prioritization Chart (REF: CPD-14-012 July 2014)

Note 1: All PSH requires documented long term disability

Note 2: Tulsa's CoC's PSH is all Dedicated or Prioritized CH

Note 3: PSH grant contracts may further restrict eligibility

